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MONTANA/ENVIRONMENTAL PROTECTION AGENCY

AGREEMENT

Agreement on the Management and Administration of Montana's Environmental Programs for Federal Fiscal Year 1980

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July 1979

Approved:

The undersigned hereby execute this Agreement on the Management and Administration of Montana's Fiscal Year 1980 Water Pollution Control, Safe Drinking Water, Air Quality, Solid Waste Management and Pesticides Programs.

State of Montana

Thomas L. Judge
Governor
State of Montana

Date

A. C. Knight, M. D., F.C.C.P.
Director, Department of Health and
Environmental Sciences

Date

W. Gordon McOmber, Director
Department of Agriculture

Date

Environmental Protection Agency

Alan Merson
Regional Administrator

Date

Ivan W. Dodson, Director
Montana Office

Date

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Governor Thomas L. Judge, in his 1978 State of the State Address, said:

> *Montana's economy is directly dependent on the quality and the sustained productivity of our agricultural lands, forests, waters, minerals, and our natural beauty. We must realize that the long-term strength of our economic sector is inseparably connected to the long-term stewardship of our natural resources.*

Several state agencies, including the Departments of Health and Environmental Sciences (DHES)and Agriculture (DOA), have primary responsibility to protect those resources. In addition, the U.S. Environmental Protection Agency (EPA) has been charged with a Congressional mandate to administer various environmental programs.

State and federal environmental regulations have become increasingly complex. To enhance communication between the State and the EPA, the Montana EPA Office was established in October 1978. The new office was granted the authority to make some of the decisions formerly relegated to the agency's Region VIII Denver Office, and to work with state agencies in the resource area.

Through grants, research, monitoring, technical expertise and other areas of cooperation, DHES, DOA and the EPA have assumed lead roles in helping Montanans improve their quality of life.

The workload created by these diverse programs prompted EPA to inaugurate a novel approach to planning and management. The approach involves a comprehensive Montana/EPA Agreement (MEA), the aim of which is to consolidate all applications and narratives into one document. The result will be a reduction in paperwork and duplication of effort.

The State programs addressed in the MEA include DOA's pesticide program and the DHES's air, water and solid waste management programs.

The elements of the MEA consist of: (1) the identification of objectives; (2) the state of the environment, that includes a problem assessment for each area; (3) a list of accomplishments for Fiscal Year (FY) 1979, (4) identification of priorities for FY 1980, and (5) detailed work plans consisting of narrative descriptions of activities and resource commitments.

OBJECTIVES

Clearly, the major objectives in environmental programs are to control pollution and to protect public health and the environment. Both state and national legislation contains many references to these objectives.

The references include:

Montana Pesticides Act:

> The purpose of the statute is the control of pesticides for the protection of man and his environment, including water, air, food, animals, vegetation, pollinating insects and shelter.

Clean Air Act of Montana

> ...to achieve and maintain such air quality as will protect human health and safety, and, to the greatest degree practicable, prevent injury to plant, animals, and property;...

Federal Clean Water Act:

> It is the policy of the Congress to recognize, preserve, and protect the primary responsibilities and rights of States to prevent, reduce, and eliminate pollution, to plan the development and use (including restoration, preservation, and enhancement) of land and water resources...

Solid Waste Management Act:

> ...control of solid waste management systems is intended "to conserve natural resources whenever possible" as well as to protect the public health and safety.

Determining the methods and approach to meeting these objectives is the business of federal, state and local environmental agencies. These organizations are in turn responsible for ensuring that all concerned parties are given the opportunity to participate in the decision-making process.

Decentralization

Recently there has been a shift from the overcentralized form of decision making and management, to a more responsive decentralized organization. Congress, working through the EPA and with cooperation from the states, has been expanding the philosophy that a decentralized organization can produce better results. Federal grants that enable states to assume program responsibilities are examples of that philosophy.

An important aspect of decentralization is delegation of responsibilities. Considerable progress has been made in delegating major program responsibilities from the EPA to the states, with Montana agressively pursuing the delegation of most federal environmental programs. From a legislative perspective, the State has most of the required authorities covered in the MEA. Due to a lack of adequate financial and human resources, however, delegation of current EPA responsibilities continues to be a phased process. The delegation of the municipal wastewater facility construction grants program under 205 (g) was a major effort completed in FY 1979. The implementation of the 205 (g) agreement will be carried forward as an objective for FY 1980.

Four additional program areas will receive attention during FY 1980.

1-Hazardous Waste Management

> A delay in adopting the final regulations precluded the State from assuming responsibility for the program.

The regulations should be promulgated by December 31, 1979. Most of the State legislative requirements have been completed. The guidelines developed by the State will be the major initiative for FY 1980 once the federal regulations take effect.

2-Prevention of Significant Deterioration (PSD)

The State has adopted regulations to assume this program. Negotiations with the EPA will be conducted during the next several months to ensure that federal guidelines are met. Approximately 25 PSD permits will need to be issued during FY 1980. During FY 1980, EPA will curtail its review of PSD permit applications, and by FY 1981 there will be little or no direct EPA permit issuance.

3-Noncompliance Penalties for Air Quality Violations

During the 1979 Legislative Session authority was granted for the State to assess penalties against stationary sources that violate provisions of the State Implementation Plan (SIP). Because of the potential magnitude of this legislation, the State will proceed with developing regulations during FY 1980, with full implementation occurring at a later date. EPA will work closely with the State to facilitate delegation and provide appropriate assistance when needed.

4-Underground Injection Control

The Underground Water Source Protection Program grant regulations were promulgated May 1979. EPA's regional administrator may award program grants to eligible states. Activities included in the program grant are the identification and characterization of aquifers used for drinking water, and the inventory and evaluation of injection wells. Because of the resource demands placed on the State in assuming responsibility, the EPA will maintain a lead role in implementation. During FY 1980, a further evaluation of the state's capability will be made and a decision reached as to whether full assumption is possible.

Montana EPA Office

In an effort to strengthen working relationships between EPA and the State environmental programs, the Montana Office of EPA was formed. This decision to localize EPA's involvement has, in most instances, supplemented state program efforts and for other situations it has helped alleviate state resource problems. Other additional assets have included the removal of many logistical problems, reduction of the need for formal communication and increased accessibility for the public to the EPA staff.

As with any new operation, several minor problems initially existed, but most of these have been solved. During FY 1980 an effort will be made to strengthen the working relationship between the Montana Office and State and Regional office.

Public Health

The common denominator in most environmental programs is public health. Ever increasing amounts of harmful substances are being identified. The impact of these substances on the health of the public continues to be a concern. In the FY 1980 overview statement by the administrator of EPA, the reduction of public exposure to dangerous pollutants was cited as a major goal. Several studies have been initiated at the state level addressing public health issues. The statewide Montana Air Pollution Study (MAPS), the Butte Radiation Study and the Pesticides Drift Study in the Kalispell area are a few of the noteworthy efforts. For FY 1980, the State and EPA will again establish as a chief objective, the identification, evaluation and control of pollutants that endanger public health.

Prevention

As a state, Montana has built a reputation for its commitment to preserve the quality of its land, water and air. When reviewing the state of Montana's environment, it becomes apparent that the state does not suffer from widespread and serious environmental degradation; a testimony to the effectiveness of the State and its citizens in carrying out their commitment. Stationary air sources, point sources from water and solid waste/hazardous material disposal problems are known, and solutions are in the process of being proposed. The State and EPA cannot, however, take the position that threats to Montana's environmental integrity are under control. The prevention aspect of the environmental programs is particularly important to Montana. As an example, the production and export of energy has been steadily increasing (Figure #1). With energy development comes accompanying environmental impacts that require regulation. For the future, Montana, like every state that feels the pressure of conflict between natural and human needs, will have to guard against unplanned and unexpected threats to its environmental integrity. Therefore, an additional major objective of the State and EPA will be the vigorous enforcement of existing environmental legislation with an emphasis on new sources.

STATE OF THE ENVIRONMENT

Monitoring and Evaluation

The environmental problems in the State of Montana are as diverse as its geography. For this reason the precise definition of problems is an evolutionary process. As more resources and expertise become available, the more thorough problem definition becomes.

Presently most physical and chemical surface water quality conditions are generally known throughout the state. Comprehensive biological monitoring is underway, with statewide coverage scheduled for completion by 1982. Lake classification work under an EPA Section 314 grant is also underway, with completion scheduled for January 1981. Fisheries classification work has been recently completed by the Department of Fish, Wildlife and Parks (DFWP). The inventorying of drinking water supplies has been an on-going effort, with the majority of supplies investigated during 1978-79.

Solid waste problems have not been completely inventoried, but a major effort is contemplated for FY 1980. Hazardous waste disposal will also be investigated during FY 1980.

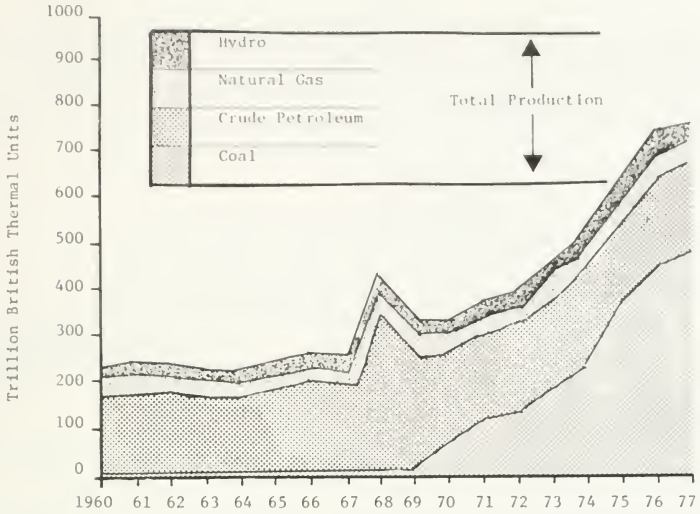


Figure 1 Production of Energy in Montana, by Type of Fuel, 1960-77

Air Quality problems related to sulfur dioxide (SO2) have been defined. Total suspended particulate (TSP) problems have been located; however, determining the causes, impacts and control techniques will require continued effort. Carbon Monoxide (CO) problems exist in at least three major cities. In order to determine the extent of the CO problem, additional data must be collected and modeling performed. More information needs to be collected to establish the extent of the lead problem. New source impacts, related to energy production and mining, on air quality are unknown and will require more monitoring and evaluation to prevent significant deterioration.

Groundwater data have historically been limited. The major initiative for FY 1980 will be EPA's implementation of the Underground Water Source Protection Program.

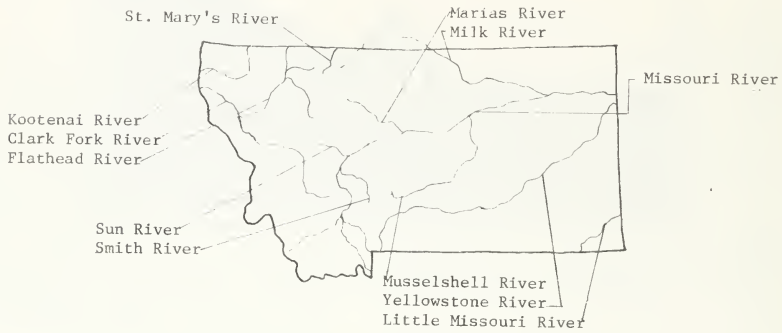
The assessment of pesticide problems has been confined to areas where accidents and misuse have been reported. A generic study of baseline conditions to determine the presence of pesticides throughout the state remains to be done. Air and soil sampling in control areas began in 1978 and 1979, and will continue in 1980, with new areas established as the equipment becomes available.

Summaries of available data by program area follow:

Water Quality

Montana has some of the highest quality water in the United States. This is exemplified by the fact that many streams support excellent fisheries. The Montana DFWP in a recent inventory estimated that there are 10,181 miles of streams that are classified as being "substantial," "high priority" or "highest value" for fishery resources.

Figure 2 MAJOR STREAMS AND BASINS



Montana, however, is not without its water quality problems. According to information compiled by the Montana Water Quality Bureau (WQB), DFWP and the U.S. Forest Service (USFS), an estimated 4,015 miles of streams in Montana are being degraded by nonpoint source pollution and dewatering, and may not meet 1983 water quality objectives.

The location and analysis of the affected streams can be found in Table #1, and Figure #2 identifies the streams affected but not specific stretches of stream. It must be noted that degradation does not necessarily mean a violation of Montana's Water Quality Standards has occurred, rather it means some beneficial use is being affected.

TABLE I

SUMMARY OF DEGRADED MONTANA STREAMS BY BASIN AND CAUSES (IN MILES)

	SEDIMENT	TEMPERATURE	DEWATERING	SALTS	NUTRIENTS	COLIFORMS	LOW DISSOLVED OXYGEN	ACID MINE WATER AND TOXIC METALS	OIL & GREASE, PHENOLS, COLOR	ARSENIC AND FLUORIDE FROM WP	MISCELLANEOUS	TOTAL MILES DEGRADED IN THE BASIN	TOTAL MILES DEGRADED IN THE BASIN BY POINT-SOURCE
UPPER MISSOURI	450	128*	128*		30	40*		20		126		735	31
MISSOURI-SUN-SMITH	160	20*	60*		12*	6		50			6 (NH_3 from sewage)	310	1
MARIAS	216*	186*	261*	125*		9			7			440	22
MIDDLE MISSOURI	180*			195*	60*	11*						240	0
MILK	290					20	24					290	0
LOWER MISSOURI				250*		70*						250	0
MUSSELLSHELL	300*	300*	300*	300*	300*	3*						300	0
UPPER YELLOWSTONE	80					25*		35	25*	60		200	unk
MIDDLE YELLOWSTONE	315			255								315	0
LOWER YELLOWSTONE	275*			275*								275	0
LITTLE MISSOURI						unk						unk	unk
UPPER CLARK FORK	75*		110*		60*		80	84*				360	0
LOWER CLARK FORK	104*					20*					2 (N_2 from dams)	120	43
FLATHEAD	55				30*	40					5 (flow & T° fluct. from dam)	120	0
KOOTENAI	12*										50 (N_2 from Libby Dam)	60	0
ST. MARY'S												unk	unk
TOTAL												4,015	97

* indicates overlap of degradation causes
unk-status unknown

Table #1 indicates that nonpoint source problems are by far the most prevalent in Montana. Activities associated with agriculture, mining, urban development and silviculture are the most significant contributors. Of these activities, agriculture by virtue of its geographic extent, is the most prevalent. When considering the agricultural problems relating to nonpoint source pollution, stream dewatering due to irrigation, increases in salinity and sedimentation are the most critical. In a previous study by the DFWP, fish were adversely affected in 285 stream segments due to excessive irrigation withdrawals. The most common water quality problem in Montana is sedimentation. According to the DFWP, 364 stream segments are experiencing sediment increases at some point due to channel alteration, bank encroachment and overuse by livestock.

Although logging of federally and corporately owned forests does degrade surface water, those operations are usually managed with the intent of reducing adverse environmental impacts. However, a major portion of Montana's forests, about 3.1 million acres, are owned by private, non-corporate land holders. Without strong silviculture management programs, future harvest could result in substantial water quality degradation.

There have been 133 water polluting mining operations identified in the Statewide 208 area alone. The exact extent of mining throughout Montana and its impacts are not fully known.

In an effort to constantly update the quality of water in the state's river basins, a water quality monitoring program has been in operation for several years. The present ambient monitoring network includes three permanent WQB stations and 13 U.S. Geological Survey (USGS) stations. Chemical and physical data are monitored monthly. This information is generally used to determine background and trend data that enable water quality personnel to ascertain which streams are not meeting the requirements for supporting aquatic life and recreational use. Periodically, intensive surveys are made when information is needed for permit reviews, construction or program planning.

Point source discharges degrade water quality, but the WQB has identified and requires permits for all known discharges. Major industrial discharges are sampled or inspected at least twice each fiscal year; while major municipal discharges are monitored at least once a year. A status report of the permits issued is included in the section devoted to permits.

Drinking Water

The initial Montana law relating to public water supplies was originally enacted in 1907. This law was revised in 1977 and again in 1979 to enable Montana to receive and retain delegation for administration of the "Federal Safe Drinking Water Act" (PL 93-523) enacted in 1974. Montana's program covered about 250 community water systems prior to 1978. The present program regulates all systems which have at least 10 service connections or serve at least 25 individuals daily at least 60 days a year. It is expected that about 2,000 supplies will be covered by this program after all inventories are completed. To date, 650 community and 900 noncommunity public water supplies have been inventoried. The community inventory was entered into the Model State Information Service (MSIS).

From a quality standpoint, Montana's drinking water is considered generally good in the western part. Those supplies in the eastern part, particularly groundwater, would be considered poor. The exception in the western part are the surface supplies which are high in turbidity. For example, Helena, Bozeman, Libby, and possibly Butte and Dillon, will need turbidity removal facilities in order to meet the Maximum Concentration Limit (MCL). In the eastern part of the state, the communities using surface supplies with few exceptions, have water treatment facilities capable of providing quality water. However, the groundwater supplies are generally high in total dissolved solids. Some of the smaller supplies have fluorides and nitrates which exceed the MCL.

Montana's biggest problems are to fully implement the "Safe Drinking Water Act" and upgrade, as soon as possible, those supplies which pose the most serious hazards to public health. Many of the state's public systems, even though they are adequate to meet the current MCL's, are in poor physical condition. A good assessment of most public supplies by qualified consultants is needed. Water rates need to be increased to provide adequate year-to-year replacement and repair. A public information program is needed to help Montanans understand the need for adequate water systems and quality water. The advantages of a state grant program for improving facilities should be investigated in the next year or two.

Construction Grants

A federal grant program was initiated in 1956 to assist municipalities in the construction of sewage treatment facilities. The State has assisted the EPA and predecessor agencies in administration of this program by establishing needs and priorities, and reviewing project applications and preliminary and final plans. Federal grants on projects have increased from 30 percent to 75 percent (85 percent where the project uses innovative or alternative treatment mechanisms such as land disposal) of eligible project costs.

Using the priority system developed by the WQB and approved by EPA, a priority list is drawn up at least once a year. Grant monies are then set aside for the top communities on the list.

The grant process is presently divided into three steps. Step 1, called facilities planning or Section 201 planning, is a detailed planning effort aimed at providing a recommended solution to a community's particular sewer and treatment problems. Included in this plan is: an analysis of the existing sewer system and treatment facility; a probe of the town's anticipated development and growth trends; a comparison of the economics and effectivenss of all treatment alternatives, and an environmental assessment of the solutions. Finally, the most cost effective, environmentally sound and socially acceptable alternative is selected.

If the plan receives the approval of the reviewing governmental agencies, after local public participation and a hearing, a grant may be awarded to provide for Step 2 expenses.

Step 2 deals with the design and preparation of plans for the selected sewage disposal facilities. Following governmental approval of plans and specifications, a grant may be made to provide for Step 3 expenses. The majority of the project costs are associated with this step -- construction. For some projects, one grant may be given that combines steps 2 and 3.

Numerous delays have been encountered in the construction grant program since passage of PL 92-500 (Water Pollution Control Act Amendments of 1972). This act in addition to providing greater federal funding, also required EPA to develop new regulations. PL 95-217 (Clean Water Act of 1977) again authorized additional monies and changed the requirements. The facility planning program must now go into much greater detail on alternatives, particularly land disposal options. It has taken consultants time to adjust to the new planning requirements, and states and EPA require more review time because of the detailed reports. In addition, because of the increased allocation to states, there are more projects. The states and EPA, therefore, have fallen behind in their review. To help overcome this deficiency and provide for more state control, WQB has applied to EPA for a greater delegation of administration of the program made possible by Section 205 (g) of PL 95-217. The legislature has approved additional manpower (six positions) and authority for the WQB to spend federal funds to this increased administrative authority. Pursuant to a delegation agreement signed during FY 1979, the State began hiring staff for this program on July 1, 1979.

The agreement identified specific activities to be performed by the State and EPA. It also identified the available and projected federal funds, Figure #3. Over a five-year period approximately 100 Step I, 150 Step II and 150 Step III grants must be awarded in order to utilize available funds. This is an average of 20 Step I, 30 Step II and 30 Step III grants each year.

Wastewater Discharge Permit Program

Montana's wastewater discharge permit program began in 1968. With passage of PL 92-500 (Water Pollution Control Amendments of 1972), a federal wastewater discharge permit program was also initiated. In 1974 Montana applied for and received authority from EPA to administer this program, thus minimizing duplication of effort. EPA established wastewater discharge limitations for the various categories. Where these limitations will not allow the meeting of water quality standards (including non-degradation of high quality waters by new discharges or existing industries), stricter limitations are imposed.

Tables #2 and #3 list the various categories of major and minor industrial wastewater discharges and their present status with regard to compliance and enforcement. Most of the projects shown as inactive have eliminated their discharges to surface waters and therefore, do not need a wastewater discharge permit.

Table #4 lists the status of the municipal discharges. Montana's five largest cities (Billings, Great Falls, Butte, Missoula and Helena) all have treatment facilities capable of meeting effluent limitations except for chlorine residual and fecal coliform bacteria. There are discharge limitations on chlorine residual because of its toxic effect on aquatic life, and meeting these limitations generally does not allow the municipality to meet the fecal coliform limits. Billings is presently experimenting with high chlorination followed by dechlorination with sulfur dioxide which appears to give acceptable results.

Many of the communities meeting discharge limitations still have treatment facility needs. For example, Helena, Kalispell and Missoula all need improvements to their sludge disposal systems. Helena and Kalispell have serious odor problems due to present sludge disposal practices. The discharge standards for sewage lagoons were relaxed during the past year by EPA and, hopefully, this will allow many of the smaller communities to meet effluent limitations with a minimum amount of improvements.

Figure 3
TOTAL FEDERAL FUNDS APPROPRIATED TO
MONTANA CONSTRUCTION GRANTS ($\times 10^6$)

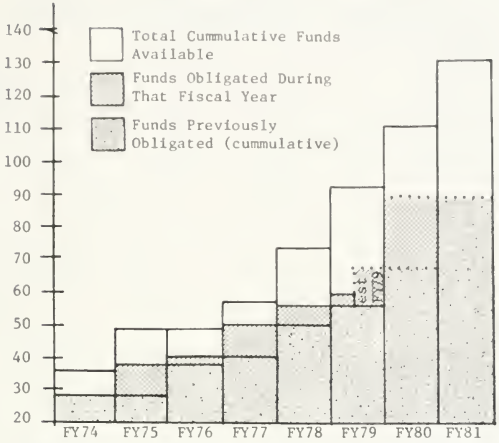


Table 2. Status of Major Industrial Wastewater Discharge Permittees

Category	Total No.	Active	Inactive	Substantially In Compliance	Not In Compliance
Major					
Smelter	3	3	0	1	2 (see note 1 below)
Railroads	1	1	0	0	1 (see note 2 below)
Plywood Mills	1	1	0	1	0
Oil Refineries	4	4	0	2	2 (see note 3 below)
Slaughter Plants	1	1	0	1	0
Sugar Refineries	2	2	0	1	1 (see note 4 below)
Paper Mills	1	1	0	1	0 (see note 5 below)
Generating Plants	2	2	0	1	1 (see note 6 below)
Totals	15	15	0	8	

1. Anaconda-Great Falls - Not meeting effluent limitations. Enforcement action taken. On schedule to comply by 1/1/80.
   Anaconda-Warm Springs - Not meeting all permit limits, compliance report being prepared.

2. B.N.-Livingston - Permit limit violations. Enforcement action taken. On schedule to comply by 1/1/80.

3. Exxon - Permit limit violations and oil spill. Enforcement action taken.
   Farmers Union - Permit limit violations. Enforcement action taken.

4. G.W. Sugar - Permit violations and dike failure. Enforcement action underway.

5. Hoerner Waldorf - Enforcement action underway for past dike break.

6. MDU - Sidney - Enforcement action taken. Presently eliminating discharge which was in violation.

Table 3. Status of Minor Industrial Wastewater Permittees

	Total	Active	Inactive	In Compliance	Not in Compliance	Notes
Minor						
Fish Farms	19	10	9	10	0	
Irrigators	19	0	19	0	0	Consider nonpoint sources under Federal legislation.
Feed Lots	156	147	9	147	0	See note 1 below
Oil Wells	60	7	53	7	0	
Mines	25	18	7	18	0	
Smelters	2	1	1	1	0	
Dairies	1	0	0	0	0	
Railroads	11	7	4	5	2	See note 2 below
Lumber & Plywood Mills	2	1	1	1	0	
Oil Refineries	3	1	2	1	0	
Highway Projects	36	19	17	19	0	
Sand & Gravel	4	1	3	1	0	See note 3 below
Slaughter Plants	1	0	1	0	0	
Cement Plants	2	2	0	2	0	
Chemical Plants	2	1	1	1	0	
Generating Plants	1	1	0	1	0	
Industrial Sewage Treatment Plants	8	8	0	8	0	Mt. Power Dam Plants
Miscellaneous	17	7	10	7	0	
Totals	369	231	138	229	2	

1. Includes 98 smaller feedlots on state permit program but not included as part of federal permit program.
2. Enforcement action against BN, Havre taken. Presently meeting compliance schedule. Compliance order to be issued to BN Whitefish for recent permit violations.
3. Enforcement action against Empire Sand and Gravel Co. underway for past violations. Company has not constructed any discharge system.

Table 4. Status of Municipal and Federal Wastewater Dischargers

	Substantially In Compliance		Not In Compliance With Secondary Treatment Standards	
Sewage Treatment Facilities	Major	Minor	Major	Minor
Municipal & State	9	71	16	54
Federal & Indian	-	30	1	4
Totals	9	101*	17	58
Water Treatment Facilities Wastewater Disposal				
Municipal	-	9	-	4
Federal & Indian	-	1	-	0
Totals		10*		4

*About 1/2 of these have no surface water dischargers.

*Enforcement Actions against Bozeman by EPA in Federal District Court.

It should be noted that essentially all dischargers (including those not in compliance) have constructed substantial treatment facilities during the last 25 years. The large percentage of noncompliance of major industrial dischargers versus the low percentage of minor dischargers is partially due to their more complex treatment facilities and greater bureau review on the dischargers that have the potential to do the most serious stream damage.

Looking to the issuance of new permits, the WQB expects several applications from new mining operations, some of which will be to high quality waters. There will also be applications from saline seep areas for discharge of saline waters. It is highly unlikely that many of these saline discharges will be allowed, due to their potential impact on surface waters. There will also be several permit applications for highway contractors to pump water from forms used in bridge pier construction.

The WQB's major job in the permit area will be assuring that permittees are complying with existing permits.

AIR QUALITY

The Big Sky Country is truly what its name implies, yet there are places where the quality of air is a fragile resource. The plains east of the Rocky Mountains provide few obstructions to the sea of air that flows across the land, but in western, southern and central Montana, where various mountain ranges form valleys, air sometimes is trapped in layered inversions, creating prime conditions for degradation.

In addition to natural inversions, man also plays a part in altering air quality. In urban areas throughout the state, such things as street dust, smoke from fireplaces and industrial emissions contribute to lowering air quality and visibility. In rural areas the largest contributors to air quality degradation are unpaved roads and mining operations.

An assessment by the Air Quality Bureau (AQB) of air quality throughout the state revealed the following information:

TOTAL SUSPENDED PARTICULATE

Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Colstrip Area	X		Street Dust and Strip Mining
Columbia Falls	X		Street Dust
Missoula	X		Street Dust, Smoke From Fireplaces and Industry
Missoula Area		X	Unpaved Rural Roads and Industry
Billings Area		X	Street Dust
Great Falls Area		X	Street Dust
Butte Area	X*		Street Dust and Mining Operation
East Helena		X	Street Dust and Industry

*EPA designation replaces state designation

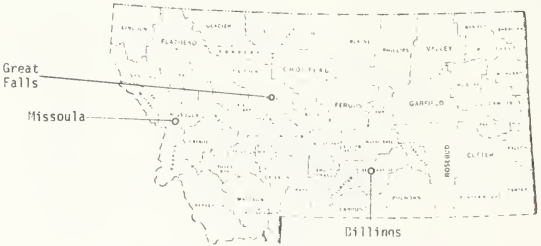
Lead

Designated Area	Does Not Meet Primary Standards	Reasons
East Helena Area	X	Smelter
Anaconda Area	-	Smelter - Still Being Evaluated

SULFUR DIOXIDE

Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Laurel Area	X		Refinery
East Helena Area	X		Smelter
Anaconda Area	X		Smelter

CARBON MONOXIDE



Designated Area	Does Not Meet Primary Standards	Reasons
Billings	X	Exhaust From Motor Vehicles
Missoula	X	Exhaust From Motor Vehicles
Great Falls	X	Exhaust From Motor Vehicles

Only the towns and areas mentioned do not meet primary or secondary air quality standards, the rest of the state presently meets the standards. Additionally, the entire state meets the standards for photochemical oxidants and nitrogen oxides.

Solid Waste Management And Hazardous Waste Disposal

The disposal of solid wastes has become a major and complex problem in Montana. Due to its complex nature it also relates to air, water and land pollution. In the future, the solid waste problem will become even more expensive, expansive and complex. It is becoming increasingly clear that the concerted efforts of all levels of government, as well as the private sector, must be employed to ensure proper waste management.

Our society consumes enormous quantities of material and energy which in turn generates an exceedingly large volume of waste. Currently, approximately 600,000 tons of municipal solid waste are being generated per year in Montana, and given the well-established waste generation rates, by 1990 nearly 870,000 tons of that waste will be generated per year. This waste is being disposed in more than 250 identified municipal disposal facilities and numerous undisclosed indiscriminate dump sites.

In addition, from state surveys it has been established that approximately 200,000 tons of potentially hazardous wastes are generated each year in Montana. This volune of hazardous waste includes pesticides, heavy metals and other industrial chemical wastes. Furthermore, a large number of "empty" pesticide and other toxic chemical containers of all sizes are discarded annually.

The state now possesses sufficient regulatory authority to control solid waste disposal. As required by the 1977 "Montana Solid Waste Management Act," the Solid Waste Management Bureau (SWMB) currently is licensing all solid waste management systems in the state. This licensing procedure assures that all such systems will provide a basic public service and not degrade the environment.

In response to action taken by the 1977 Montana Legislature, the SWMB is providing both technical and financial assistance to local government entities for the development of waste management systems.

Legislative amendments enacted in 1977 give the DHES control over hazardous wastes, including licensing authority for hazardous waste transporters. Also in 1977 the SWMB published a survey of hazardous waste generation, storage, treatment and disposal. This survey included 236 industries as well as other generators of hazardous waste, such as hospitals, pesticide users and septic tank service companies. The bureau is now developing its hazardous waste program, but will not begin licensing hazardous waste facilities until FY 1980.

Currently no licensed hazardous waste disposal facility is located in Montana. This situation does not pose an immediate problem because of the availability of such sites in neighboring states. However, with the inauguration of a statewide hazardous waste program the difficult task of siting a hazardous waste disposal facility may have to be initiated in Montana.

The bureau has given and continues to render technical assistance to local governments, businesses and small industries concerning hazardous waste management needs and problems. Possible alternatives for collection, storage and disposal of small quantity hazardous wastes are presently being evaluated. Special arrangements for wastes from laboratories, retail establishments, pesticide users and small industrial generators may be necessary to alleviate the burden of hazardous waste disposal in sanitary landfills and to prevent illicit hazardous waste disposal.

A number of instances of improper waste management have been investigated in the last few years. The SWMB has begun to establish a working relationship with the industrial community which may be regulated under the forthcoming hazardous waste regulations.

Pesticides

Montana is primarily an agricultural state and as such requires the use of pesticides to help manage a multitude of pest problems. In 1978 commercial applicators sprayed 2,869,685 acres of crop land with liquid and powder pesticides. In terms of volumes of pesticides applied to Montana crops, 339,864 gallons and 491,027 pounds of herbicide were applied, as were 17,235 gallons and 50,556 pounds of insecticide and 2,650 gallons and 1,317 pounds of fungicide.

While continued use of pesticides is generally beneficial to the agricultural community, its use has caused concerns and problems in non-agricultural environments. Some of the problems have included: excessive residues from spraying; damage to ornamental plants; damage to non-target plants and animals, and contamination of livestock and human water supplies. In order to effectively deal with these and other problems, the DOA's Environmental Management Division administers a pesticide applicator certification program and an enforcement program. Since their inception the programs have significantly reduced the amount of pesticide contamination in Montana, despite the fact the number of commercial and private applicators have increased significantly in the last four years (Figures #4 and #5).

Figure 4

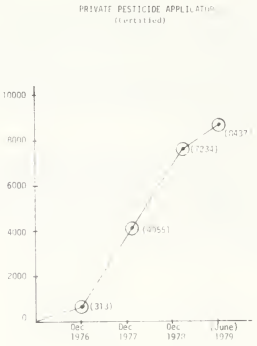
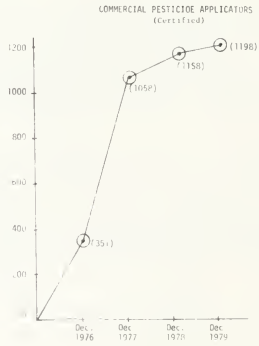


Figure 5



The basic elements of the pesticide programs include education, enforcement, monitoring and sampling.

In the area of education, efforts have been made this year to alert applicators of the problems that may occur when pesticides are mixed to reduce application costs and when non-persistent pesticides are used repeatedly for a number of years.

The recent recurrence of energy related problems has led some to believe that mixing pesticides to cut down the number of applications--thus saving fuel costs--is good business. However, the unknown and known consequences of mixing pesticides can create more problems that it may solve.

Along the same line, the DOA is concerned that the annual use of non-persistent pesticides may, over a period of time, be harmful and produce undesired results.

In the area of regulation and enforcement, the division inspected and certified more than 1,200 private and 600 commercial applicators in FY 1979.

Efforts in the areas of monitoring and sampling are currently concentrated in establishing basic information concerning the consequences of spray drift on urban areas and establishing a network of control plots throughout the state.

An air monitor was set up in the Flathead Lake area to determine the amount of aerial drift that occurs during the annual spraying for fruit crop and potato pests. The information derived from the monitoring will give DOA personnel a basis for ascertaining the effects of the spray on residential and urban areas.

Planning was also started on establishing a network of test plots throughout the state to provide baseline information on the effects of pesticides in the environment. Soil and air samples from each site will enable DOA personnel to determine concentrations of pesticides, and will give them something with which to compare future samples.

Radioactivity

Elevated levels of radioactivity are currently being studied in two parts of Montana by state and federal agencies.

The DHES has been studying elevated radioactivity in water wells and geothermal springs in the Alhambra area since it was discovered in 1976. The latest studies by the DHES and U.S. Geological Survey have been suspended while the State turns its attention to the recently discovered elevated levels of radiation in the Butte area.

The DHES has independently been investigating the radiation levels in Butte for more than a year. Although a variety of studies are still in progress, it appears that the elevated radiation levels are due to a combination of natural and displaced radioactive materials.

Although the DHES studies have been funded by the state, EPA has assisted in the effort by sending a radiation scanner van to Butte for several days, loaning the DHES indoor radon sampling units and flying over the area with radiation detection equipment.

Noise

As Montana's urban areas grow, so will the problems related to noise. Presently only one city, Missoula, has responded to local noise problems by applying to the EPA for a grant from the Quiet Communities Program.

Plans have been made by the EPA to establish an Office of Noise to serve as a technical assistance center for Region VIII. The University of Montana is being considered as a possible site for the center.

Toxics

Asbestos

After the discovery that many schools throughout the state contained asbestos building materials, the EPA sent each school information that told how to collect samples and how to take remedial steps to reduce the danger from sprayed asbestos materials.

The EPA will continue to assist schools in getting samples tested and coordinating technical assistance.

Polychlorinated Biphenyl (PCB)

The EPA sent copies of the Federal Register that discusses disposal marketing of PCB to all known persons and businesses that use PCBs in Montana. The EPA plans to continue to inform, sample and help mitigate PCB problems.

FISCAL YEAR 1979 ACCOMPLISHMENTS

Federal fiscal year 1979 was an active one for Montana environmental programs. It was the first year the Montana office of EPA was in operation; the legislature was in session; major delegation of EPA's construction grants program to the state occurred, and the State Implementation Plan (SIP) for air quality was completed.

The following information reflects major state or EPA accomplishments during the year:

Water

Wastewater Discharge Permit and Enforcement Program

- A backlog of approximately 60 expired permits was eliminated.
- The Great Falls sewer main break was successfully resolved.
- Permit violation settlements and compliance schedules for the Burlington Northern at Havre and Livingston were completed.
- The State applied for permitting authority for federal facilities.

Water Quality Management Planning

- Four areawide plans were submitted and reviewed by the WQB and EPA. The first draft of the plan for the remainder of the state was completed. The governor and EPA approved the four areawide plans.

- Water Quality awareness was increased through the WQB's public participation and public service announcement programs. All the major television stations in Montana participated.

- Each of the 59 conservation districts signed management agreements. These agreements will serve as the basis for an agricultural nonpoint source control program.

- Reports on the southwest and northcentral biological monitoring loops were completed. These give comparative ratings to streams and basic information.

- A long-term temperature/flow/fish study on upper Missouri River tributaries began in cooperation with the DFWP and USGS.

- Priorities for Rural Clean Water Project funds to control agricultural nonpoint sources were established in cooperation with other agencies.

- Major contributions were made to the Upper Missouri Level B study.

- Technical and administrative assistance was given to the four areawide programs and five Indian tribes on preparing work plans for FY 1980.

- Section 208 Management agreements were negotiated with USFS, BLM and Flathead Irrigation Project (Bureau of Indian Affairs (BIA)).

- EPA participated in the National Forestry Water Quality Management Workgroup.

Construction Grants

- An agreement was prepared for EPA to delegate additional responsibilities for administration of construction grant program to the WQB. The agreement was signed and implemented during the fiscal year.

- Total obligations for the Municipal Facilities Construction Program fiscal year total $12.5 million dollars. Twenty-three facility plans were reviewed; 7 approved; and 10 negative declarations prepared and published.

- The grant for the new sewer forcemain at Great Falls was quickly processed so the city could proceed expeditiously with the project. The new line was operational within five months after the break.

- Other construction grants work included:

  -- Step 1 grants awarded: 6.

  -- Step 2 grants awarded: 3.

  -- Step 3 grants awarded: 5.

-- Step 4 grants awarded: 2 (steps 2-3).

-- Plans and Specifications approved: 8 sets.

-- Construction contract awards reviewed and approved: 11.

-- Grant increases awarded: 17.

-- Administrative grant amendments made: 14.

-- FY 1979 Construction Grants Priority List was reviewed and determined to be acceptable.

-- Grant decreases processed: 6.

-- Final inspections made: 8.

Drinking Water

- The inventory of the small community and noncommunity public drinking water supplies continued. The inventory should be completed by January 1, 1980. Inspections are being made on most of the supplies that were inventoried in previous years. The new supplies are being entered on the state computer system.

- Chemical analyses were completed on most of the community water supplies. Those not meeting MCL's have been so notified.

- Assistance was given to some of the supplies having operational problems.

- The Pits, Ponds and Lagoons assessment is completed.

- Regulations for insitu uranium solution mining were adopted by the Board of Health.

- Regulations for commercial haulers of drinking water were adopted by the Board of Health.

- Several meetings were held around the state to inform the smaller water suppliers of the Safe Drinking Water Program.

Other Water-related Accomplishments

- A substantial amount of time was spent participating in the International Joint Commission (IJC) which is studying ways to protect water quality in the Poplar River. At issue is the diversion usage and return of water to the Poplar River from power plants in Saskatchewan and the possible degradation of water quality. Approximately .5 person year was expended by the Water Quality Bureau and .3 person year by EPA on the IJC activities.

- The WQB's study to relate salinity to biological stream life in the Tongue River continued. The project was funded by the BLM and USGS, and should be completed in mid FY 1980.

- Assistance was provided to Solid Waste Management and Subdivision Bureaus on potential groundwater problems.

- Training for about 300 water and wastewater operators included an annual week-long school, seminars and 10 week (one evening a week) training courses. An oxidation ditch seminar was held specifically for operators, consultants and state employees directly involved with this treatment mechanism.

- The EPA administered the $400,000 Flathead Basin Study.

- The bureau completed an environmental impact statement for Poplar River Power Plant development and administered water quality funds.

- The EPA's quality assurance lab evaluation was completed with no major discrepancies noted.

Solid Waste

As of May 1, 1979, The Solid Waste Bureau had issued 112 licenses to solid waste management systems throughout the state. Of these licenses, 73 are permanent and 39 conditional. This licensing process also is the mechanism being utilized to gather baseline information for the open dump inventory.

In the past two years, the bureau has provided or committed $240,000 in state grant funds to local governments for detailed solid waste management planning. The grants involve 196 municipalities, 17 county governments, the National Park Service, a military installation, one private industry and an Indian reservation. The grants directly affect at least 330,000 Montana citizens.

The bureau reviewed all of the draft and proposed regulations under Subtitle C of Resource Conservation Recovery Act (RCRA). Montana participated in the National Governors' Association Hazardous Waste Task Force. Separate written comments were submitted to the EPA on its December 18, 1978 proposed regulations. The bureau also reviewed its own law and rules and related state laws to find any problems or shortcomings in relation to full program authorization under RCRA.

The disposal of toxaphene from scabies control activities occurred last year. This program has resulted in the disposal of approximately 50,000 gallons of a 0.5 percent toxaphene solution at several locations across the state. However, the disposal sites and methods employed in the program may need to be changed as further information is computed.

Air

The AQB processed 98 construction permits to assure that new air pollution sources comply with all air quality rules and standards. The bureau performed 7,500 laboratory analyses on 2,800 samples to evaluate the effects and levels of air pollution. It analyzed 149,000 hourly field samples to investigate the air pollution levels throughout the state.

The AQB enforced compliance with air quality rules through 123 field surveillance actions.

The bureau submitted SIP revisions for non-attainment plans and prevention of significant deterioration plans to protect and maintain future air quality.

The AQB, with direct assistance from the Montana office of EPA, completed the non-attainment SIP. The EPA completed its review and published the results of the review in the Federal Register.

An agreement is being developed between the bureau and EPA on acceptable procedures for performing and completing compliance inspections. The AQB will have completed 10 inspections by the end of fiscal year 1979.

The Montana ambient air monitoring "Network Review" was reviewed.

The first Indian Section 105 grant in the United States was developed for the Northern Cheyenne and is being developed for the Crow.

The Colstrip #3 and #4 final decision was made by EPA.

Pesticides

The DOA accomplished the following EPA funded program activities in Fiscal Year 1979:

- Dealer Stock Surveys and Inspections.....460
- Establishment Inspections..... 12
- Applicator Inspections.....800
- Private Applicator-use Observations.....1,000
- 24(c) Registered Product Inspections..... 60
- Established an Analytical Pesticide Laboratory.....completed
- Established an Efficacy Laboratory.....completed
- Collection of and Analysis of Pesticide Samples:

  Formulation
  Samples.....250
  Analysis performed.....700

  Residue
  Samples.....200
  Analysis performed.....700

- Implemented a Laboratory Quality Assurance Program

- Certification Training
  Commercial Applicators and Dealers.....423

  Private Applicators.....1,203

- Certificates Issued
  Commercial Applicators.....1,120

  Private Applicators.....8,437

  Dealers.....670

- Experimental Permit Inspections..... 5

- Pesticide Accident Investigations.....70

- Pesticide Misuse Investigations.....150

- Enforcement cases..... 44

- Efficacy Studies.....6

- Special Investigations..... 5

- Implemented Data Processing Program for Certificates, Qualifications and Violations.....completed

- Records Survey of Applicators and Dealers.....1,460

- Implemented an Employee Health and Safety Program.....completed

- Wife Pesticide Safety Training Program.....completed

Non-Grant Pesticide Activities

The Environmental Management Division of DOA provides pest management services to producers, industry, government agencies and the general public. These services include establishing intergrated pest management programs for specific cropping systems, recommendations on use of pesticides, identification and surveillance of pests and the evaluation and resolution of the effects of pesticides on agriculture and the environment. The division also registers 3051 pesticide products prior to their use in the state, licensed 620 pesticide dealers and 1120 applicators and their employees (250), regulates the sale of pesticides at the retail level. These services are provided by personnel situated in Helena and in the six district field offices. The department's laboratory provides analytical regulatory and service analysis to other departmental programs and to the general public. Thus, a more comprehensive pesticide regulatory and service program is provided to Montanas by combining the state and federal pesticide laws and pest management laws, than would be provided by each program separately.

EPA-Pesticides

The EPA assisted the DOA in monitoring all pesticide special use permits, conducting training and implementing its enforcement grant.

Hazardous Wastes

The Asbestos in Schools Program was established. Guidance was given to all school districts during implementation.

Radiation

Technical assistance was made available in investigating the extent of the Butte radiation problem.

National Environmental Policy Act (NEPA)

In meeting EPA's review responsibility under NEPA, the following EIS's were reviewed:

- Colstrip 3 and 4
- Northern Tier Pipeline
- ASARCO Troy Mine
- Kootenai Falls
- Spring Creek Mine
- Numerous Forest Service P.U's
- Numerous BLM Projects
- Missouri Breaks Grazing

In an effort to identify potential environmental issues and remove assessment deficiences related to the construction grants, program conferences were held with Bozeman, Missoula, Hamilton, Bridger Bowl and Kalispell.

PRIORITIES

The following priorities identify activities that represent most of available resources in the state environmental programs and the EPA Montana Office. When reviewing the priorities,it should be noted that some of them are broadly stated to the point of including an entire program area. The priorities are not listed in order of importance and represent joint Montana/EPA priorities, unless otherwise noted. Not all priorities are supported by a detailed narrative, but are included in the summary work plan.

Air

- Implementation of State Air Quality Plan (SIP)
- Prevention of Significant Deterioration
- Air Quality Monitoring
- Transportation Control Plans
  - Billings
  - Missoula
  - Intergovernmental Cooperation
  - Great Falls Carbon Monoxide Plan

- Development of Air Quality Plan for Lead
  East Helena Plan
  Anaconda Plan
- Compliance and Enforcement
  10 inspections of major sources, assistance on compliance activities, assistance on enforcement actions as needed (EPA)
- Emergency Episodes
  Assist in revising plan and putting in telemetry system (EPA)
- Assist and Participate in Special Studies
  Flathead and Poplar River
- Assist Indian Tribes in Establishing 105 Programs
  Provide project officer for grants (EPA)
- Develop and Participate in Training Program

Water

Construction Grant Program

- Implement 205 (g)
- Employ Staff (WQB)
- Formalize Montana EPA office role in administration of program (EPA)
- Coordination with COE, Solid Waste Bureau, municipalites and consultants to provide for more effective review
- Promote utilization of feasible innovation or alternative treatment methods through distribution of literature, seminars, individual contracts and project reviews
- Assure that adequate operation and maintenance (O & M) will be provided through O & M Manuals, adequate staffing and proper training - provide a continuing education program and operator needs assessment through the 106 program
- Assist the state in developing and implementing a training program for new state engineers (EPA)
- Maintain average obligation rate of $1.3 million/month - develop system for tracking obligations

Water Quality Standards

- Complete second round revision
- Initiate third round revision

Wastewater Discharge Permit Program

- Issue, reissue or modify major permits ensuring that water quality standards are met; toxic criteria limitations and pretreatment requirements are met; toxic criteria limitations and pretreatment requirements are imposed; residual wastes are handled appropriately (input from Solid Waste Management Bureau to be provided), and appropriate effluent limitations and self-monitoring are provided
- Issue, reissue or modify other permits
- Provide compliance monitoring twice yearly of all major industrial permittee discharges and once yearly of 10 major municipal dischargers
  Compliance monitor 10 minor dischargers where self-monitoring data is suspect - provide a quality assurance program to assure appropriate laboratory results

- Provide appropriate enforcement, giving priority to major dischargers
- Provide timely review and appropriate notification on self-monitoring information
- Inspect all major dischargers and 50 percent of minor dischargers yearly using appropriate report forms
- Assist in training enforcement and compliance personnel (EPA)

Safe Drinking Water Program Implementation

- Provide additional personnel assistance to obtain better program organization, to accomplish objectives more expeditiously and to maintain a good record keeping system
- In cooperation with other states and EPA, try to obtain revision of January 1, 1981, deadline date for meeting of MCL's - this will provide better credence for the program (WQB)
- Issue variances and exemptions with reasonable compliance schedules giving priority to those supplies having the greatest health hazard
- Complete inventory of all community and noncommunity supplies
- Expand noncommunity surveillance
- Conduct sanitary surveys on at least 90 percent of the systems and provide technical assistance where needed
- Provide continuing education and operator certification programs
- Continue the lab certification program with assistance being provided by the Chemistry and Microbiology Bureaus for both certification and analyses - maintain an adequate quality assurance program
- After completion of the "Pits, Ponds and Lagoons Assessment" review the need and substance for groundwater regulations
- Increase coordination with Sections 201, 208, 314 and Solid Waste and Hazardous Waste programs

Water Quality Management Program (Section 208)

- Obtain EPA certification of the Statewide 208 plan (WQB)
- Continue needs assessment to provide an adequate inventory of the quality of the waters of the states and to define problem areas - Provide appropriate biological, physical and chemical water monitoring program emphasizing the use of intensive surveys for problem areas and use of stream modeling for program backup
- Continue to implement the agricultural nonpoint source program through the use of Conservation District 208 agreements, coordination, contracts and agreements with agricultural organizations and agencies and public education
- Obtain active public participation in the improvement of plans, best management practices and implementation of plan objectives - Monitor $10,000 public participation contract
- Work with areawide agencies to integrate their programs with the state's plan and to further their objectives and local participation

- Develop a water quality index to assist in the development of improved 305 (b) plans
- Increase involvement of federal agencies, particularly USFS and BLM in water quality implementation (EPA)

Clean Lakes

- Continue to develop Section 314 Inventory and Classification Program
- Assist local organizations in developing Section 314 applications - provide technical assistance as required

305(b)

- Prepare FY 1980 305(b) report incorporating physical, chemical and biological data

Solid Waste and Hazardous Material

- Development and implementation of hazardous waste program
- Open dump inventory
- Development and implementation of regulatory program
- Develop state solid waste plans
- Assist in resolving Butte radiation problem (EPA)
- Public awareness

Noise

- Assistance to any interested community in obtaining a quiet community program (EPA)
- Develop public education, training programs as necessary (EPA)

Toxics

- Participate in identifying and developing integrated strategies for specific toxic chemical problems (EPA)
- Identify and take corrective action to solve asbestos problems (EPA)
- Insure compliance with PCB requirements (EPA)

Pesticides

- Maintain and improve the established quality of the pesticide enforcement program
- Maintain the established pesticide certification and training program
- Implement reciprocal agreements with the Indian reservations on certification and enforcement (EPA)

Emergency Response

-Revise emergency response plan

Public Participation

-Implement new public participation requirements for construction grants, solid waste, drinking water and water quality management programs.

RESOURCE SUMMARY

A financial and workyear summary fo programs included in the MEA are found in Table 5. The summary only includes programs receiving federal funds.

Lead agency designations refer to the fact that the majority of effort, but not all the effort, will be made by the organization. To some degree, identified activities are shared by more than one organization.

The EPA totals include both the Denver Regional Office and the Montana Office. These totals do not include clerical and administrative assistance.

Categorical programs are those that cross organizational boundaries or do not relate specifically to one of the major program areas. State resources have not been assigned to these activities, but some attention is contemplated.

NARRATIVES AND WORK PLANS

Following the Resource Summary, Table 5, are the Narrative Descriptions of individual programs, supported by detailed work plans. The work plans consist of two forms. The first form concentrates on priority issues and the second form, which appears at the end of each major program area, summarizes all activities.

RESOURCE SUMMARY

Table 5

Program	Federal Grant ($)	State Resources ($)	State Workyears	EPA Workyears	Lead Agency
Water					
Section 106	348,588	72,000	16.05	2.90	
Permits and Enforcement	185,500		7.90	1.15	WQB
Standards and Monitoring	68,000		3.35	.45	WQB
Plan Review	23,000		1.00		WQB
Dredge and Fill	16,000		.80	.20	WQB
O&M,Training, Certification	40,000		2.30	.10	WQB
Groundwater	14,000		.70		WQB
Clean Lakes Coordination	2,000				
Section 205(g) Construction Grants	301,100		12.0	2.85	WQB
Environmental Assessments				.40	EPA Helena
Section 314 Clean Lakes Classification	100,000 (FY 1979	3,000 (FY 1979)	.24	.10	WQB and Consultants
Water Quality Management	368,475		7.50	2.25	
State	200,250	51,800	7.50		WQB
Areawide	102,000				Local Planning Agencies
Indians	66,225				EPA Helena
Flathead Study	355,000			.20	EPA Helena
Poplar River EIS				.10	EPA Helena
Safe Drinking Water	294,500	98,200	16.2	1.2	WQB
Undergroun Injection Control			.1	.2	EPA Denver
Water Program Totals	1,667,663	222,000	51.99	9.60	

Program	Federal Grant ($)	State Reaources ($)	State Workyears	EPA Workyears	Lead Agency
Air Program					
State Implementation Plan (SIP)	240,536	141,813	14.2	2.0	AQB
Prevention of Significant Deterioration	25,409	14,980	1.5	.50	AQB
Monitoring	262,342	154,670	9.6	.25	AQB
Transportation Control Plan	13,551	7,989	.8	.25	AQB
Lead SIP's	73,551	7,989	.8	.20	AQB
Training	1,694	999	.1		AQB
Flathead Project	80,000	Administration	Administration	.03	AQB
Indian 105 Grants	90,000 +	Administration	Administration	.15	EPA Helena
Poplar River Project	80,000 +	Administration	Administration	.02	AQB
Non-Compliance	1,694	999	.1		AQB
Public Involvement	3,388	1,997	.2	.05	AQB
Administration	101,620	59,953	6.0		AQB
Air Program Totals	973,785	391,389	33.3	3.45	

Program	Federal Grant ($)	State Resources ($)	State Workyears	EPA Workyears	Lead Agency
Solid Waste					
State Plan	7,500		.18	.05	SWMB
Open Dump Inventory	32,000		1.00	.10	SWMB
Regulatory	2,500		.06	.05	SWMB
Hazardous Wastes	106,764		2.60	.60	SWMP
Indians				.05	EPA Helena
Total Solid Waste	156,764	39,191	3.84	.85	
Pesticide					
Enforcement	602,641	106,349	25.20	.94	DOA
Certification	20,400	20,400	3.69	.06	DOA
Indians				.05	EPA Helena
Total Pesticides	623,041	126,749	28.89	1.05	
Categorical Programs					
Asbestos				.10	EPA Helena
Toxics				.17	EPA Helena
Noise				.11	EPA Helena
Emergency Response				.30	EPA Helena
Federal Agency EIS Review				.35	EPA Helena
Total Categorical				1.03	

WATER PROGRAMS

Safe Drinking Water Program Implementation

Construction Grants

Environmental Assessments on Wastewater Treatment Projects

Water Quality Management Planning

Clean Lakes

Wastewater Discharge Permit Program

Water Quality Standards, Monitoring and Quality Assurance

Flathead Study

Poplar River EIS

SAFE DRINKING WATER PROGRAM IMPLEMENTATION

The major work done to date under the Federal "Safe Drinking Water Act" has been to inventory new water supplies regulated under the act and to analyze samples for coliform bacteria and chemical constituents. Suppliers have been notified where their samples have not met MCLs.

Major objectives for the coming year will be the following:

1. Improving the compliance of community water supplies in submitting the required number of samples for bacterial analysis.
2. Improvement of the bacteriological quality of those supplies not meeting bacteriological standards.
3. Monitoring and enforcing the public notification requirements where the supplies do not meet bacteriological, turbidity and other MCLs.
4. Establishing compliance schedules for those systems which need physical improvements to meet MCLs.
5. Providing enforcement through the Legal Division where this assistance is needed to protect public health.
6. Updating of regulations to assist in improving public water supplies.

The maximum date that can be given to meet MCLs is January 1, 1981. This is not a realistic date for the projects requiring substantial construction. This date was established by the federal act and should be changed by Congress. Also, the MCL established for fluorides needs to be raised. The present standard is an aesthetic standard which should be placed in the secondary standard category rather than the primary standard category if it is to remain at the 2.5 ppm level.

The WQB with assistance of some of the local health departments has been inventorying community and noncommunity (those serving a transient population) public supplies. Priority is being given to complete this inventory by January 1, 1980. The State will continue with a routine surveillance program of all supplies which were previously inventoried. The bureau will have the support of the DHES's Laboratory Division in continuing analyses of bacteriological and chemical samples, and will maintain a quality assurance program. The Laboratory Division will also review procedures for quality assurance and laboratory techniques for other laboratories doing sample analyses for public water supplies and certify the qualified laboratories.

The WQB will continue to review and approve, when appropriate, plans and specifications for water system improvements, extensions, and new supplies. Training of new and existing water supply personnel will also receive priority as these people are responsible for the day to day operation of facilities to provide safe drinking water. An educational program to stress the importance of safe drinking water to operators, municipal officials and the public will be given emphasis. The training will include information to suppliers on the importance of having a contingency plan in case of emergencies. The operator certification program will continue under administration of the WQB and with assistance from the Water and Wastewater Certification Board.

Also of priority is increased coordination with other programs which may have an effect on the State's drinking water. Facility planning under Section 201 of PL 92-500 can assist in improving drinking water by sewering areas which are

contaminating drinking water supplies. Improved treatment of sewage can also improve drinking water supplies. Similarly, water quality planning through Section 208 can improve drinking water supplies by controlling nonpoint sources of pollution. Section 314 (Clean Lakes Program) can also assist in improving drinking water quality by providing grants to projects to restore lakes, some of which are used for drinking supplies. Probably of greatest benefit will be the Solid Waste and Hazardous Waste Control Programs which should aid in keeping underground drinking waters uncontaminated from disposal sites. The WQB will assist other bureaus of the division in reviewing projects which could affect drinking water.

The Underground Injection Control (UIC) Program under the Safe Drinking Water Act is another program which should assist in preventing pollution of groundwater. Montana has recently been designated as one of the states needing such a program. The UIC Program will primarily control oil injection and wastewater disposal wells. Because of the large number of these wells (estimated 870) and anticipated funding and staffing problems, the WQB does not at this time plan on seeking authority from EPA to administer this program. However, it will assist EPA as much as possible in initiating a program. During the past year the Board of Health and Environmental Sciences adopted rules to control insitu solution mining of uranium. Some applications are expected during FY 1980 for mining of uranium. Processing of applications for projects of this nature will be coordinated with the Department of State Lands (DSL) and the DNRC.

Finally, the WQB will provide an annual report as required by EPA and will participate in EPA's annual evaluation of the WQB's program. It will also work with EPA in the preparation of the FY 1981 State/EPA agreement.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Safe Drinking Water Implementation

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Improve the drinking water quality of Montana's public water supplies by increased surveillance, education and enforcement.	1. Compliance and Enforcement	Continuous					Water Quality Bureau (WQB) Safe Drinking Water Section (SDWS) with assistance from Legal Division.
	a) Enforce drinking water regulations giving priority to public water supplies creating imminent public health hazards.		.3 WQB .2 Legal		11,000		
	b) Enforce public notice requirements for violation of maximum contaminate level (MCL), testing procedures, variance exemptions granted, failure to follow compliance schedule and failure to meet monitoring requirements.		.2 WQB .1 Legal		7,000		EPA responsible for public water supplies on Indian Reservations which are not administered by incorporated communities.
	c) Issue variances and/or exemptions, provide public hearings as required and issue compliance schedules for meeting MCL.		.2 WQB .1 Legal		7,000		
	2. Monitoring and Surveillance	Continuous					WQB will establish schedules.
	a) Monitor supplies through microbiological and chemical analyses. Samples Analyzed: Microbiological State Lab = 13,000 Other Labs = 6,000 Chemical Inorganic =300 Organic = 25 Nitrates only =500 Radio nuclides =450		1.6 Lab	0.1	—		Laboratory Division and other certified laboratories will do analyses. Laboratory Division, Microbiological Laboratory. Laboratory Division, Chemical Laboratory.
			0.2 WQB 3.0 Lab		30,000		
	b) Complete inventory of community and non-community public water supplies. Supplies inventoried: Community = 50 Non community =250	Jan. 1, 1980	.5 WQB 0.2 Local		18,000		WQB - SDWS, with assistance of local health departments and contract sanitarian.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Safe Drinking Water Implementation

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
	c) Inspections of previously inventoried public water supplies. Inspections: Community public water supplies =500 Non community public water supplies=800	Continuous	2.0 WQB 1.5 Local		40,500 30,000		WQB - SDWS, with assistance of local health departments.
	d) Administer contracts with local health departments for inventories and inspections of small community and non community water supplies. Number of contracts = 27 Number of counties = 33	Continuous	0.2 WQB		4,000		WQB - SDWS and Legal Division.
	e) Maintain data storage	Continuous	1.5 WQB		25,000		WQB - SDWS with contract sanitarian.
	3. Laboratory Certification and Quality Assurance			0.1			
	a) Provide certification by evaluations of laboratories and provide a Quality Assurance Program to insure uniform and accurate laboratory results. Labs certified: Microbiology 13 1.5 my Chemical 9 0.2 my	Continuous	1.7 Lab		30,000		Laboratory Division.
	4. Regulation Revision			0.2			
	a) Revise regulations to conform to recent revision of State law to include new provisions for granting of variances and exemptions, operator responsibility and revised fee schedule.	Dec. 31, 1979	0.05 WQB 0.05 Legal		3,000		WQB - SDWS with assistance of Legal Division.
	b) Revise regulation for plan review to permit more flexibility for approval.	Dec. 31, 1979	0.05 WQB 0.05 Legal		3,000		WQB - SDWS with assistance of Legal Division.
	c) Finalize regulation for certification of labs.	June 30, 1980	0.05 WQB 0.05 Legal		3,000		WQB - SDWS with assistance of Legal Division.
	d) Write new regulations covering cross connections and bottled water.	Sept. 30, 1980	0.05 WQB 0.05 Legal		3,000		WQB - SDWS with assistance of Legal Division.

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Safe Drinking Water Implementation

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
	5. Operator Training and Certification						WQB
	a) Provide training and certification for operators and managers. Numbers trained: Annual School @ MSU = 70 On the job = 10 Seminars = 100 TOTAL 180		0.85 WQB		20,000		
	b) Provide certification for water supply and distribution operators. Exam given = 100 Number of certified operators = 700		0.4 WQB		—		
	6. Plan Reviews						
	a) Review plans for new supplies and system improvements. Estimated plan reviews = 150		1.3 WQB		22,000		WQB
	7. Public Information						
	a) Keep public informed through news releases, public meetings, radio and television spots, literature distribution and correspondance. News releases = 20 Public meetings = 10 Radio and television spots = 5		.4 WQB		12,000		WQB and Public Information Office
	b) Encourage public participation in formulation of regulations and policies.		.05 WQB		1,000		
	8. Underground Injection Control Programs			.2			EPA
	a) Assist EPA on UIC		0.1 WQB		2,000		WQB
	b) Review proposed uranium solution mining plans		0.3 WQB		5,000		WQB
	9. Assist other Bureaus in reviewing potential hazards to drinking water supplies.		0.2 WQB		4,000		WQB

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Safe Drinking Water Implementation

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
	10. Administer programs including: Preparation of annual report Mid-year evaluation Draft State/EPA agreement Final State/EPA agreement Coordination with other programs	Dec. 15, 1979 April 1, 1980 June 1, 1980 Sept. 15, 1980 Continuous	0.5 WQB	0.6	14,000		WQB - SDWS
	EPA and WQB TOTALS LEGAL TOTALS LOCAL TOTALS LAB TOTALS		9.4 .6 1.7 6.3	1.2	$294,500		WQB/EPA

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CONSTRUCTION GRANTS

The 205(g) delegation agreement will give the state the authority and funding to aasume substantial delegation of the construction granta program. The state should be fully staffed by midyear with a total of 12 person years of effort devoted to the program. Considerable improvement in granta processing and quality of projects should result with the increase in state reaources.

The state will promote the use of any feasible alternative or innovative technology for the correction of existing and future wastewater disposal problems. Continued efforts will be made to inform the public, consultants and state personnel on innovative and alternative processes and techniques so that theae processes can be fully evaluated and accepted.

The State's activity in Steps 2 and 3 will be augmented by the Corps of Engineers (Corps). The Corps' expertise in plan and specification review and construction inspection will be utilized to the greatest extent possible. State personnel will use Corps personnel for training purposes so that in the future the state will have the expertise to assume the responsibility of the function now delegated to the Corps.

The role of the Montana Office, and to a lesser extent the regional EPA office, will be one of oversight and monitoring. Some duplication of effort, particularly in facility plan review, will occur until such time the state personnel feel comfortable in completing detail reviews in accordance with the 205(g) agreement. Training of a new state staff will be a high priority, and the Montana Office will assist whenever possible.

A continuous effort will be made to stimulate public interest in the construction grants program. The revised public participation requirements will be implemented on all new grants, and increased public participation will be stressed for existing grants.

ENVIRONMENTAL ASSESSMENTS ON WASTEWATER TREATMENT PROJECTS

All plans for federally funded wastewater treatment and collection facilities require an assessment of their environmental impacts. The Montana Office of EPA will review approximately 15-20 facility plans for adequacy (content, full array of reasonable alternatives, etc.) of their environmental assessments.

Implicit in this environmental assessment review is the need to consult with the various municipalities and their planning consultants to see that an adequate assessment is planned before the plan is begun, and to work with these same groups once the planning process has begun. Also, most projects will require that stipulationa be added to the grant and enforced to assure environmental protection.

In certain instances, such as controversial projects, a full environmental impact statement may be required. The EIS constitutes a more detailed analysis with extensive public involvement added.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Construction Grants

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
To provide Montana's public entities with federal funds to plan, design and construct adequate water pollution control facilities in the most efficient and expeditious manner possible.	1. Administration		3.3	1.2	82,800		
	A. Priority List						WQB
	Draft	05/01/80	(0.08)	(.1)	(2,010)		WQB/EPA
	Final	07/15/80	(0.02)	(.05)	(500)		WQB/EPA
	B. Needs Survey		(0.1)	(.05)	(2,510)		
	C. 205g - Negotiation		(0.1)	(.05)	(2,510)		WQB/EPA
	1. State beginning phase in						
	i. Payment Requests	12/31/79					
	ii. Site Title Opinion	06/30/80					
	iii. Preconstruction Conf.	12/31/79					
	iv. Prep. of Grant Offer	03/31/80					WQB/EPA
	2. State assuming full authority						
	i. Step 1 Grant Application	03/31/80					
	ii. Step 2 Grant Application	03/31/80					
	iii. Step 3 Grant Application	12/31/79					
	iv. Facility Plans	09/30/80					
	v. UCS, SUO, ICR	06/30/80					
	vi. Payment Requests	06/30/80					
	vii. Site Title Opinion	12/31/79					
	viii. Preconstruction Conf.	03/31/80					
	ix. Prep. of Grant Offer	20	(0.1)	(.1)	(2,510)		WQB
	D. Preapplication Conferences		(0.9)	(.2)	(22,580)		WQB/EPA
	E. Grant Applications	20					
	1. Step 1	30					
	2. Step 2	30					
	3. Step 3	ongoing	(0.2)	(.05)	(5,020)		WQB/EPA
	F. Payment Requests	ongoing	(0.5)	(.1)	(12,550)		WQB/EPA
	G. Public Participation	80	(0.1)	(.05)	(2,510)		WQB/EPA
	H. Prep. of Grant Offer	ongoing	(1.0)	(.3)	(25,100)		WQB/EPA
	I. Record keeping, filing, typing	ongoing	(0.2)	(.2)	(5,020)		WQB/EPA
	J. Training						
			3.6	.75	90,330		WQB/EPA
	2. Step 1: Facility Planning						
	A. Midcourse reviews	10	(1.2)		(30,110)		
	B. Approvals	20	(2.4)		(60,220)		

CONSTRUCTION GRANTS

The 205(g) delegation agreement will give the state the authority and funding to assume substantial delegation of the construction grants program. The state should be fully staffed by midyear with a total of 12 person years of effort devoted to the program. Considerable improvement in grants processing and quality of projects should result with the increase in state resources.

The state will promote the use of any feasible alternative or innovative technology for the correction of existing and future wastewater disposal problems. Continued efforts will be made to inform the public, consultants and state personnel on innovative and alternative processes and techniques so that these processes can be fully evaluated and accepted.

The State's activity in Steps 2 and 3 will be augmented by the Corps of Engineers (Corps). The Corps' expertise in plan and specification review and construction inspection will be utilized to the greatest extent possible. State personnel will use Corps personnel for training purposes so that in the future the state will have the expertise to assume the responsibility of the function now delegated to the Corps.

The role of the Montana Office, and to a lesser extent the regional EPA office, will be one of oversight and monitoring. Some duplication of effort, particularly in facility plan review, will occur until such time the state personnel feel comfortable in completing detail reviews in accordance with the 205(g) agreement. Training of a new state staff will be a high priority, and the Montana Office will assist whenever possible.

A continuous effort will be made to stimulate public interest in the construction grants program. The revised public participation requirements will be implemented on all new grants, and increased public participation will be stressed for existing grants.

ENVIRONMENTAL ASSESSMENTS ON WASTEWATER TREATMENT PROJECTS

All plans for federally funded wastewater treatment and collection facilities require an assessment of their environmental impacts. The Montana Office of EPA will review approximately 15-20 facility plans for adequacy (content, full array of reasonable alternatives, etc.) of their environmental assessments.

Implicit in this environmental assessment review is the need to consult with the various municipalities and their planning consultants to see that an adequate assessment is planned before the plan is begun, and to work with these same groups once the planning process has begun. Also, most projects will require that stipulations be added to the grant and enforced to assure environmental protection.

In certain instances, such as controversial projects, a full environmental impact statement may be required. The EIS constitutes a more detailed analysis with extensive public involvement added.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Construction Grants

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
To provide Montana's public entities with federal funds to plan, design and construct adequate water pollution control facilities in the most efficient and expeditious manner possible.	1. Administration		3.3	1.2	82,800		
	A. Priority List						WQB
	Draft	05/01/80	(0.08)	(.1)	(2,010)		WQB/EPA
	Finsl	07/15/80	(0.02)	(.05)	(500)		WQB/EPA
	B. Needs Survey		(0.1)	(.05)	(2,510)		
	C. 205g - Negotiation		(0.1)	(.05)	(2,510)		WQB/EPA
	1. State beginning phase in						
	i. Payment Requests	12/31/79					
	ii. Site Title Opinion	06/30/80					
	iii. Preconstruction Conf.	12/31/79					
	iv. Prep. of Grant Offer	07/31/80					WQB/EPA
	2. State assuming full authority						
	i. Step 1 Grant Application	03/31/80					
	ii. Step 2 Grant Application	03/31/80					
	iii. Step 3 Grant Application	03/31/80					
	iv. Facility Plans	12/31/79					
	v. UCS, SUO, ICR	09/30/80					
	vi. Payment Requests	06/30/80					
	vii. Site Title Opinion	06/30/80					
	viii. Preconstruction Conf.	12/31/79					
	ix. Prep. of Grant Offer	03/31/80					
	D. Preapplication Conferences	20	(0.1)	(.1)	(2,510)		WQB
	E. Grant Applications		(0.9)	(.2)	(22,580)		WQB/EPA
	1. Step 1	20					
	2. Step 2	30					
	3. Step 3	30					WQB/EPA
	F. Payment Requests	ongoing	(0.2)	(.05)	(5,020)		WQB/EPA
	G. Public Participation	ongoing	(0.5)	(.1)	(12,550)		WQB/EPA
	H. Prep. of Grant Offer	80	(0.1)	(.05)	(2,510)		WQB/EPA
	I. Record keeping, filing, typing	ongoing	(1.0)	(.3)	(25,100)		WQB/EPA
	J. Training	ongoing	(0.2)	(.2)	(5,020)		WQB/EPA
			3.6	.75	90,330		
	2. Step 1: Facility Planning		(1.2)		(30,110)		
	A. Midcourse reviews	10	(2.4)		(60,220)		
	B. Approvals	20					

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Construction Grant

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
	3. Step 2:		3.2	.2	80,000		
	A. UCS, SUO_2 and ICR	20	(0.08)		(2,010)		WQB/EPA
	B. Plans and Specifications		(3.03)		(76,030)		
	i. Midcourse reviews	30					WQB/EPA
	ii. Approvals	30					WQB/EPA
	iii. COE review for biddability and constructability	30					COE
	C. Site Title Opinions	30	(0.06)		(1,510)		WQB/EPA/Legal Division
	4. Step 3:		1.3	.2	32,620		
	A Change Order and Addenda Review	ongoing	(0.5)		(12,550)		WQB/EPA
	B. Bid Document Review	30	(0.06)		(1,510)		WQB/EPA/COE
	C. Preconstruction Conferences	20	(0.2)		(5,020)		WQB/COE
	D. Construction Inspections	40	(0.5)		(12,550)		WQB/EPA/COE
	5. O&M Review:		0.6	.1	15,060		
	A. O&M Manual	15	(0.3)		(7,530)		WQB/EPA
	B. Plan of Operation	15	(0.1)		(2,510)		WQB/EPA
	C Start up Services	10	(0.2)		(5,020)		WQB
	TOTALS		12.0	2.45	301,100		

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Environmental Assessments on Wastewater Treatment Projects

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Achieve environmentally acceptable WWTP projects via review of approximately 20 201 plans (FY 1980).	(1) Conduct pre-grant (Step 1) review of projects to assess problems/needs. (2) Review Step 1 grant work plan for inclusion of assessment aspects. (3) Consult, as needed, with facility planners during preparation of facility plan. (4) Review facility plans for adequacy of assessment. (5) Review facility plan to make determination of need for full EIS. (6) If needed, work with facility planner and others involved to correct/improve assessment or begin preparation of EIS.	per construction grant schedule	per construction grant schedule	.25	see construction grants		EPA
Prepare/manage environmental impact statement (EIS) through draft and final decision on project phases. (Probably one EIS in FY 1980).	(1) Prepare scope of work for EIS (in consultation with others involved). (2) Prepare and let contract for EIS. (3) Issue draft EIS, hold hearings, revise draft if necessary. (4) Issue final EIS as EPA decision document.			.15		50,000	EPA
			TOTALS	.40		50,000	

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WATER QUALITY MANAGEMENT PLANNING

During fiscal year 1980, the Water Quality Management Planning program will continue to change from a total planning effort to one of implementation, monitoring and evaluation. Of major concern will be the coordination of implementation of areawide and statewide plans.

Agricultural nonpoint source pollution has been identified through the planning process as the most significant water quality problem. As such, it is logical that a considerable amount of resources will be devoted to the implementation of a program that will deal with the problem. Implementation will be carried out in accordance with the management agreement which has been signed between DHES, DNRC and each conservation district. Since the recommended Nonpoint Sources Control (NPS) program will be nonregulatory in nature, continued support will be given to the regulatory program administered by the Lewis and Clark Conservation District for comparison purposes. Obligations under the Rural Clean Water Program will continue to be carried out as it ties in closely with an agricultural NPS Program.

While other nonpoint source problems such as those from silviculture, mining and urban runoff exist in Montana, they will not be treated as priority items. Nevertheless, continued efforts to implement the recommendations contained in the statewide 208 plan will be made.

Biological monitoring will continue to play an significant role in the program. Emphasis will, however, shift from regional loop monitoring to more intensive studies of stream segments where problems have been identified by impact on the receiving stream is not well documented.

Continuation of an active public participation program has likewise been given a priority during this period. While public awareness of general water quality problems and programs has improved in past years, considerable work remains to be done. In addition, as plan recommendations are implemented, there will be an increasing need to convey to the public, information on management agreements, control programs and best management practices. New requirements for public participation will require numerous meetings to provide a forum for such input.

Stream dewatering and maintenance of instream flows is also a priority concern for the coming fiscal year. Efforts will be divided between collection of flow and temperature information on the Upper Missouri tributaries and providing computer assistance for any modeling efforts which would be necessary.

During FY 1980 the EPA-administered Indian 208 program will continue with ongoing water quality problem assessments, development of appropriate control programs, revision and updating of draft plans and production of final program plans leading to implementation. Closer coordination with air, solid waste and pesticide programs will be attempted.

The remainder of efforts will be spent in coordination of plan implementation with other state and federal programs and coordination of such things as Clean Lakes, Clark Fork water quality study and disaggregation of Bureau of Economic Analysis, U.S. Department of Commerce, population estimates by the Department of Community Affairs.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Water Quality Management Planning

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
To improve the quality of Montana's water through problem assessment, selection of Best Management Practices (BMPs) for non-point sources and implementing agencies after adequate public participation, and initiate implementation of ths BMPs.	1. Coordinate implementation of statewide and area-wide plans for purposes of uniformity and to eliminate duplication of effort				7,000		WQB/EPA
	a. Review areawide plan updates	4/year	0.1	0.1			
	b. Review annual work plan	4/year	0.1	0.03			
	c. Periodic meetings with areawide project directors	20/year	0.1	0.1			
	d. Review and process financial requests	20/year		0.05			
	2. Implementation of agricultural NPS control program with Conservation Districts				68,000		
	a. Review CD's annual work reports	58 reports	0.2	0.02			WQB/EPA
	b. Provide technical assistance in development of district water quality management plans	ongoing	0.2	0.02			WQB/EPA
	c. Cooperate with CD in arriving at solutions to water quality problems which the CD is unable to solve	ongoing	0.2	0.02			WQB/EPA
	d. Assist CD's with education and information program	ongoing					
	e. Assist CD's in documenting NPS problems by making available monitoring and analysing services	Upon request	0.3				WQB
	f. Administration of a regulatory NPS control program by the Lewis & Clark Conservation District	ongoing				19,800	Lewis & Clark Conservation District
	g. Monitor cost and effectiveness of L&C Conservation District program	ongoing	0.1				WQB
	h. Implementation of NPS control program by CD's in accordance with signed management agreement	ongoing				25,200	Montana Association of Conservation Districts
	3. Participate in RCWP and ACP special projects as specified by regulation.	%			5,000		WQB/EPA
	a. Serve on State Rural Clean Water Coordinating Committee	12/mtgs/year	0.17	0.1			
	b. Submit candidate project areas based on water quality information	June 1, 1980	0.1				
	c. Review and certify RCWP applications			0.2			
	d. Provide assistance to RCWP applicants						
	e. Certify ACP water quality BMPs		0.02				

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
	4. Implementation of 208 plan through coordination of water quality management planning with other bureau activities such as NPDES and construction grants.						
	a. Daily communications and periodic staff meetings	Ongoing	0.2		4,000		WQB
	5. Continuation of biological monitoring effort		1.0		40,000		WQB/EPA
	a. Completion of regional loop monitoring	June 1, 1980				20,000	Consultant
	b. Intensive surveys of suspected problems	four studies					
	c. Review monitoring reports			0.05			
	6. Development of management agreements to implement Statewide 208 plan.		0.1	0.05	2,300		WQB/EPA
	a. U.S. Forest Service	Nov. 15, 1979					WQB/EPA
	b. Other agencies as necessary						WQB/EPA
	7. Collection of data to identify instream flow needs for Upper Missouri Tributaries		0.2		4,550		WQB
	8. Coordinate with DCA in the disaggregation of BEA population projections for use in federally funded programs.		0.1	0.1	2,300		WQB/EPA
	9. Continuation of public participation program		1.3		30,000		WQB
	a. Information/education programs to explain management agreements and control programs for agriculture, silviculture, etc.	20 programs				4,000	Consultant
	b. Increase awareness of general water pollution control programs through meetings and publications	25 programs					WQB/EPA
	c. Provide opportunity for public input in various bureau programs	six public meetings					WQB
	d. Monitor public participation grant			0.1		10,000	EPA
	e. Publish EPA newsletter regarding WQB	four years		0.1			EPA

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
	10. Continuation of computer capabilities for 208 program.		1.0		20,000		WQB
	a. Storage and retrieval of all water quality data	ongoing					
	b. Assist in modeling efforts for in-stream flow needs	upon request					
	11. Completion of current Clark Fork Drainage Water Quality Study	December 31, 1979					Five Valleys District Council University of Montana
	a. Review individual reports and recommendations	February 15, 1980	0.01	0.02	300		WQB/EPA
	12. Provide secretarial assistance to Water Quality Bureau efforts	ongoing	0.5		6,000		WQB
	13. Coordinate implementation of 208 program on four Indian reservations						
	a. Review outputs from first year program	ongoing		0.05			EPA
	b. Review detailed work plans	August 1979					
	c. Review and process financial requests	20/year		0.05			EPA
	d. Review periodic progress reports	20/year		0.05			EPA
	e. Meet with project directors and tribal representatives	7/year		0.2			EPA
	f. Review final program outputs	Sept. 1980		0.2			EPA
	14. Participate in development of FY 81 SEA and statewide 208 workplan		0.1	0.1	2,200		WQB/EPA
	15. Participate on Upper Missouri River Level B Management Board						
	a. Review final plan			0.05			EPA
	b. Participate with public hearings			0.02			EPA
	16. Participate in quality assurance activities with WQB state labs and EPA Reg. office			0.05			EPA
	17. Administration of grant agreements & amendments for 106, 208, Poplar River			.1			EPA
	18. Participate on IJC Poplar River Board.			.05			EPA

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Implementation of certified area-wide waste treatment management plans							
Flathead Drainage 208	1) Develop management agreements counties cities Forest Service Flathead Irrigation Project		0.2				FD 208
	2) Identify WQ sensitive areas		0.2				FD 208
	3) Assist in CD identification of RCWP project areas		0.3				FD 208
	4) Assist Lakeside Sewer District in WQ study		0.1				FD 208
	5) Carry out recommendations formulated during growth work shops		0.2				FD 208
	6) Review subdivision and facility plans		0.2				FD 208
	7) Coordinate 208 program with Flathead EIS		0.1				FD 208
	8) Annual plan update		0.2				FD 208
	9) Assist CD's in education program		0.3				FD 208
	10) Administration		0.2				FD 208
					Total 48,750		

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Middle Yellowstone APO	1) Develop management agreements		0.1				MYAPO
	2) Investigate chrome waste deposits near Columbus		0.1				MYAPO
	3) Assist CD's in implementing management agreement		0.2				MYAPO
	4) Monitor coal and uranium mining development		0.15				MYAPO
	5) Annual plan update		0.2				MYAPO
	6 Improve public involvement		0.15				MYAPO
	7) Administration		0.1				MYAPO
				total	24,750		
Yellowstone-Tongue APO	1) Refinement of BMP's		0.05				YTAPO
	2) Assist CD's in identification of RCWP project areas.		0.1				YTAPO
	3) Monitor mining activities		0.15				YTAPO
	4) Provide WQ expertise to CD's		0.2				YTAPO
	5) Coordinate implementation by federal agencies		0.2				YTAPO
	6) Annual plan update		0.1				YTAPO
	7) Assist CD's in Education program		0.15				YTAPO
	8) Administration		0.05				YTAPO
				total	12,000		

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Blue Ribbons 208	1) Develop remaining management agreements		0.05				BR 208
	2) Review Forest Service projects		0.05				BR 208
	3) Assist CD's in identification of RCWP project areas, serve on SRCWCC		0.05				BR 208
	4) Review facility plans and coordinate with state and federal agencies		0.1				BR 208
	5) Annual plan update		0.1				BR 208
	6) Assist CD's in Ag education program		0.1				BR 208
	7) Administration		0.05				BR 208
				Total	16,500		

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Water Quality Management

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Fort Peck Indian 208	- Continue evaluation of previously collected water quality data for nonpoint source identification		.2		$15,000		Assiniboine and Sioux Tribes
	- Coordination with other programs (Poplar River, Upper Missouri Level B, etc.)		.2				Assiniboine and Sioux Tribes
	- Review and modify existing water quality standards and stream classifications as required.		.2				Assiniboine and Sioux Tribes
	- Conduct intensive public participation and education effort.		.2				Assiniboine and Sioux Tribes
	- Refine and update the final 208 plan.		.2				Assiniboine and Sioux Tribes
Fort Belknap Indian 208	- Update and implement the recommendations developed during the previous grant period.				$11,125		Fort Belknap Indian Reservation

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Water Quality Management

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Blackfeet Indian 208	- Conduct instream flow studies on selected major streams.			1.0 (FWS)	$21,225		Blackfeet Tribe of the Blackfeet Indian Reservation and U.S. Fish and Wildlife Service
	- Monitor and enforce plan recommendations regarding streambed alterations, lakeshore management, logging, etc.		.2				Blackfeet Tribe
	- Continue to refine and update stream classifications based on previously collected data.			.1 (FWS)			U.S. Fish and Wildlife Service
	- Revise and update final plan.			.1 (FWS)			U.S. Fish and Wildlife Service
	- Administration.		0.05	.05 (FWS)			Blackfeet Tribe and U.S. Fish and Wildlife Service
Northern Cheyenne 208	- Water code implementation.		.2		$18,750		Northern Cheyenne 208 Project
	- Indian lands study - Surface Mining Act		.2				Northern Cheyenne 208 Project
	- Water Monitoring		.2				Northern Cheyenne 208 Project
	- Hydrologic data analysis		.2				Northern Cheyenne 208 Project
	- Interagency coordination		.2				Northern Cheyenne 208 Project
	- Tribal natural resource regulation		.2				Northern Cheyenne 208 Project
	- Water quality modeling		.2				Northern Cheyenne 208 Project
	- Information and education		.2				Northern Cheyenne 208 Project
	- Energy development impact assessment		.2				Northern Cheyenne 208 Project
	- Administration		.2				Northern Cheyenne 208 Project

CLEAN LAKES

Due to a lack of resources, previous lake investigations by the state have dealt with a small number of problem areas where local interests supported state involvement and basic inventory work under the National Eutrophication Survey. Such investigations included:

1. A study of the nutrient budgets of Flathead Lake and Canyon Ferry and Hebgen reservoirs;
2. a survey of Twelve Lakes near Kalispell and
3. the national survey of 15 Montana lakes.

The planned activities of the WQB and its major consultants are:

a) To identify and classify by eutrophic condition all publicly owned fresh water lakes in Montana;
b) to begin development of procedures, processes and methods to control sources of pollution in Montana lakes where needed;
c) to develop and, where possible, apply methods and procedures to restore the quality of degraded lakes, and
d) to develop a priority system for such restoration.

For FY 1979 the WQB made application to EPA for a $100,000 grant (matched by $43,000 State funds) to identify and classify by eutrophic status all publicly owned fresh water lakes. The inventory, classification and prioritization will be handled by contract with the DFWP and the university system. Lakes receiving early attention for both investigations and possible Section 314 Clean Lakes Grants are Georgetown, Foy, Echo, Mary Ronan and Sacajawea. Georgetown Lake has a current proposal in EPA headquarters for a Phase I grant (diagnostic study) submitted for State and EPA Montana Office review during April, 1979. Funding is possible during FY 1980.

The major role of the WQB is to monitor and manage the Classification Grant. Technical assistance will also be provided on a demand basis to potential Section 314 applicants. The Montana Office of EPA will provide grants and technical assistance particularly on monitoring techniques. EPA Denver will provide technical review and national guidance.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE Clean Lakes

OBJECTIVE		ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
				WORKYEARS		DOLLARS		
				STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Complete inventory and classification, develop control and management program, apply methods of restoration for degraded freshwater lakes of Montana.	1	Grant application developed and grant received	July 1, 1979			100,000	(FY 1979)	WQB, EPA-MD
	2.	Complete drafting and negotiation of subagreement	July 15, 1979	.04	.01	3,750		WQB, F&G, MSU, MU, EPA-MD
	3.	Complete literature review and manpower search	Jan. 1, 1980	.04			12,500	F&G
	4.	Collect physical and cultural background data	Jan. 15, 1980	.04			12,500	MSU
	5.	Followup on known, documented problem lakes	Jan. 15, 1980				12,500	MU, MSU
	6.	Lakes selected for further investigation	Feb. 15, 1980	.04			3,750	WQB, F&G, MU, MSU
	7.	Investigations and problem definitions completed, classification made, suggested restorative measures identified.	Sept.01, 1980	.04	.05		37,500	WQB, F&G, MU, MSU, EPA
	8	Priority system and management program recommended.	Sept 01, 1980	.04			12,500	MU, MSU
	9.	Public participation - meeting	Oct. 01, 1980	.01	.02		2,500	F&G, MU, MSU, EPA
	10.	State and EPA approval	Jan. 01, 1981	.01	.02	2,500		WQB, EPA-MD, EPA Denver
		TOTALS		.26	.1	6,250	93,750	

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WASTEWATER DISCHARGE PERMIT PROGRAM

The priority of the Montana Pollutant Discharge Elimination System is to administer and enforce an effective wastewater discharge permit program. This is an ongoing program in which permit applications for new dischargers are reviewed and, if appropriate, permits are issued. Major dischargers which have the greatest potential to affect public health or substantially affect the quality of a stream receive the highest priority in the program. The minor dischargers, most of which can affect a stream locally, are also important and receive review, but not as detailed as major dischargers.

Self-monitoring reports are required to be submitted by all dischargers for review by the WQB. Compliance monitoring is performed by the bureau at a frequency necessary to assure accuracy of results of the major dischargers. The minor dischargers are compliance monitored when it is apparent that analyses may be in error or the discharger is out of compliance with its discharge limitations. Support is provided by the Laboratory Division in the analyses of samples. Inspections of treatment facilities are also performed to assure adequate operation of facilities. Investigations are also made when complaints are received on permittees or where possible violations are occurring by persons not having a permit.

Compliance schedules are set-forth for those dischargers not meeting minimum effluent limitations established by EPA as stream standards are violated. For municipalities the compliance schedules are coordinated with the WQB Construction Grants Sections so the projects which are creating the biggest problems are given the highest priority for federal funds. Input for the Solid Waste Management Bureau will be provided to assure that residual wastes are properly handled.

A review of EPA's consolidated permit program will be conducted, and recommendations made and possibly implemented where appropriate.

Enforcement action is taken where effluent limitations are exceeded, self-monitoring reports are not submitted as outlined in the wastewater discharge permit or compliance schedules are not met. Enforcement may be in the form of a letter from the WQB, a compliance order issued by the department or a district court action to seek compliance and a monetary penalty where warranted. Support is received from the Legal Division and the regional EPA office on enforcement.

The Clean Water Act enacted in 1977, allows the states administering the federal wastewater discharge permit to have permitting authority over federal installations. The WQB has applied for this authority. EPA will still be responsible for dischargers on Indian Reservations except in incorporated municipalities. The Clean Water Act requires states administering the permit program to adopt a pretreatment program which will control certain discharges to municipal systems. The WQB will submit its proposed program to EPA during FY 1980.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Wastewater Discharge Permit Program

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Aggressively control point source discharges to protect public health, sensitive ecological systems and other beneficial water uses.	1. Issue, reissue or modify major permits insuring that Water Quality Standards are met, toxic criteria limitations and pretreatment requirements are imposed, residual wastes are handled adequately and appropriate effluent limitations and self-monitoring are provided. Estimated number = 10	Continuous	1.4	.3	$45,000		WQB Permits Section with assistance from EPA Program coordination with other agencies particularly when EIS Indian Reservation permits outside incorporated municipalities
	2. Issue, reissue or modify minor permits Estimated number = 75	Continuous	1.7	.1	$35,000		
	3. Provide compliance inspections and sample monitoring.	Continuous	0.7 WQB 0.7 Lab	.1	$15,000 $12,000		WQB Permit Section with assistance from Laboratory Division
	a) Compliance monitoring, inspections of all major dischargers using EPA Form 3560-3						
	b) Sampling inspections of all 15 major industrial permittees at least twice; 10 major municipal discharges will be sampled at least once; at least 10 minor dischargers will be sampled at least once.						
	4. Provide appropriate enforcement action.	As needed	1.0 WQB 0.50 Legal	1.2	$25,000 $12,000		WQB with assistance from Legal Division and EPA-Denver
	a) Violations which are continuing and causing damage to an existing beneficial use will be given prompt attention.						
	b) Violations by major dischargers with discharges of toxic materials will be given high priority.						
	c) Other violators will be handled as time allows.						
	5. Provide timely review and appropriate notifications on self-monitoring information. Estimated number or reports reviewed = 960	Continuous	0.5	.1	$10,000		WQB Permit Section EPA-Helena will review Indian Reservation Permits
	6. Reconnaissance inspections Estimated number = 75	Continuous	0.5		$12,000		WQB Helena with assistance from Kalispell and Billings Branch offices
	7. Assume federal facility delegation (except Indian Reservations).	Oct. 1, 1979	0.02	.05	$ 500		WQB Permit Section with assistance from Legal Division and EPA
	8. Assume delegation of pretreatment programs.	Apr. 1, 1980	0.1	.05	$ 2,000		WQB Permit Section with assistance from Legal Division and EPA
	9. Investigate complaints of illegal discharges and possible violations of water quality standards and provide follow-up.	Continuous	0.7	.1	$15,000		
	10. Provide coordination between permits/enforcement program and construction grant program (includes quarterly non-compliance report).	Continuous	0.08	.05	$ 2,000		WQB Permits and Construction Grants Sections, EPA Helena
	11. Review NPDES programs for possible inclusion the EPA's consolidated permit program.	As required		.1			EPA
	TOTALS		7.9	2.15	$185,500		

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WATER QUALITY STANDARDS, MONITORING AND QUALITY ASSURANCE

The Water Quality Bureau proposed revisions to the water quality standards in FY 1978, to the Board of Health and Environmental Sciences. Because of the substantial number of comments received at a public hearing, many of which requested an environmental impact statement (EIS), and because the need for an EIS under MEPA was not a clear cut issue , the Board requested the WQB to provide an EIS on the proposed changes. New guidelines are now being proposed pursuant to Montana Environmental Policy Act which would specifically exclude environmental regulations from the EIS requirements. The WQB has not proceeded with the EIS because available manpower normally assigned to water quality standards was diverted to the Poplar River International Joint Commission Study of impacts associated with the proposed Saskatchewan electrical generating facilities, located in the Poplar River basin. This study is now essentially completed and work is again being devoted to revision of the standards.

Of most importance at this time is the formulating of a regulation to set forth a nondegradation policy. It was previously a part of the proposed FY 1978 standards revision. It is now planned to propose a newly written regulation on nondegradation to the Board at its September meeting. It is important that this policy be adopted at an early date as it is expected that there will be requests for degradation under the social and economic clause in the State's Water Quality Act. Work is also continuing on revision of the other water quality standards by reviewing and assessing the comments received at the hearing and proposing new water quality standards which will include an assessment of the effects of the revisions. The WQB expects that these standards will be ready for public hearing at the November Board meeting. The remainder of the standards, except for a chlorination policy and a few minor changes, appear to be adequate for FY 1980. Inclusion of toxic substances criteria which are appropriate to waters of the state will be considered. However, with EPA proposing new regulations for water quality standards review/revision and also for final criteria documents for the 65NRDC toxics, it is probably advisable to wait and include these in the "third round" of standards revisions which should be considered in FY 1981.

Water quality monitoring will continue to further establish the existing quality of the state's waters so future standards are based on the most appropriate data. A review of existing standards with regard to total dissolved solids has already been started through contract. This will indicate areas where data is adequate and show areas where additional information is needed. Priority will be given to obtaining this data.

The objective of the Bureau's monitoring program is to provide information for management decisions regarding the quality of Montana's waters. For this reason, the monitoring program is highly activity-related (mining, logging, agriculture and industrialization).

Basically, the Bureau's monitoring program follows the guidelines as set forth in the "Basic Water Monitoring Program" established by the Environmental Protection Agency. The Bureau's monitoring program includes:

(A) Fixed Station Monitoring
(B) Intensive Surveys
(C) Quality Assurance
(D) Data Processing and Handling

(A) Fixed Station Monitoring

Much of the fixed station monitoring in Montana is done by the United States Geological Survey and is identified as part of the state's fixed monitoring network. Routine monitoring, i.e., effluent monitoring, done by the state is also part of the fixed monitoring network.

Following is a list of the 16 stations that are the State's Ambient Monitoring Network:

St. Mary River at International Boundary	USGS NASQUAN
Missouri River at Toston	USGS NASQUAN
Marias River near Chester	USGS NASQUAN
Missouri River at Virgelle	USGS NASQUAN
Musselshell River at Mosby	USGS NASQUAN
Missouri River below Fort Peck Dam	USGS NASQUAN
Milk River at Nashua	USGS NASQUAN
Missouri River near Culbertson	USGS NASQUAN
Clarks Fork of the Yellowstone at mouth	WQB
Yellowstone River at Billings	USGS NASQUAN
Bighorn River at Bighorn	USGS NASQUAN
Tongue River at Miles City	USGS NASQUAN
Powder River near Locate	USGS NASQUAN
Clark Fork at Deer Lodge	WQB
Flathead River at Flathead, B.C.	USGS NASQUAN
Flathead River at Holt	WQB

(B) Intensive Surveys

Intensive surveys to determine the adequacy of present wastewater treatment facilities are scheduled for communities that pose a potential for exceeding water quality criteria.

Much of the Bureau's intensive surveys will be done in conjunction with technical studies identified by other programs, i.e., State-wide 208's biological monitoring.

(C) Quality Assurance

The Bureau has implemented the "Minimum Quality Assurance Program" as outlined by the Environmental Protection Agency.

(D) Data Processing and Handling

The automated data processing and handling system for Montana's water quality data was realized in FY 1978. Periodic updates will be made to the system throughout FY 1980. When these updates are made, the data will be placed on the STORET file.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Water Quality Standards, Water Quality Monitoring and Quality Assurance

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
*Review and revise Water Quality Standards to reflect most current needs, data, toxic criteria and monitor water quality to provide data for better standards. Provide for quality assurance.	1. Adopt standards for nondegradation policy. a) Board hearing and adoption. b) EPA approval or disapproval including necessary publication of materials in Federal Register.	Sept., 1979		.02			WQB, Legal Division, Board and EPA EPA
*This schedule assumes that EPA will be able to generate the necessary criteria documents, regulations and guidelines without significant slippage. Litigation, major objections to these documents or other issues may necessitate delays. The state is urged to proceed with caution on final drafting until all necessary materials have been made final by EPA. The "third round" Water Quality Standards review/ revision is expected to carry over into FY 1981.	2. Review and propose minor revisions to Water Quality Standards	Oct. - Nov., 1979	0.2 WQB 0.05 Legal	.02	6,000.		WQB with assistance from Legal Division, Advisory Council and EPA
	3. Adopt minor revisions to standards. a) Board hearing and adoption. b) EPA approval or disapproval including necessary publication of materials in Federal Register.	Nov., 1979		.03	1,000.		WQB, Legal Division, Board and EPA EPA
	4. Monitor streams particularly in eastern Montana to provide data for updating standards - particularly conductivity. Maintain quality assurance.	Continuous	1.5 WQB 0.7 Lab		30,000. 10,000.		WQB with assistance from Laboratory Division
	a) An estimated 50 stream segments will be monitored. b) USGS/BLM study relating salinity to benthic life.					5,000.	WQB through contract with USGS
	5. Provide data storage for water quality sample analyses and assess data for compliance with Water Quality Standards. Acquire data from other agencies and retrieve data for their usage.		0.5 WQB	.02	12,000		WQB with assistance from EPA, Bure of Mines and Geology, USGS, USFS a other agencies.
	6. Start revisions to standards for "third round".	Dec., 1979 Sept., 1980	0.3 WQB 0.1 Legal	.05	9,000.		WQB, Legal Division an EPA
	7. Publish proposed regulations for Water Quality Standards review/revision in the Federal Register.	Aug., 1979					EPA
	8. Publish final criteria documents for the 65 NRDC Topics.	Dec., 1979					

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Water Quality Standards, Water Quality Monitoring and Quality Assurance

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19__ RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
	9. Publish final regulations for Water Quality Standards review/revision.	May, 1980					EPA
	10. Issue final guidelines for Water Quality Standards review.	June, 1980					EPA
	11. Evaluate Montana Department of Environmental Sciences to assure compliance with "Interim-Certification" requirements for SDWA.			.1			EPA
	12. Evaluate Montana Department of Agriculture Laboratory in support of the Pesticide Enforcement Agreement.			.1			EPA
	13. Overview of Montana's quality assurance activities, provide assistance as required.			.1			EPA
	EPA and WQB TOTALS Legal TOTALS Laboratory TOTALS		2.5 .15 .7	.45	68,000.	5,000.	

FLATHEAD STUDY

The Flathead River Basin Environmental Impact Study began the second year of the five year effort authorized by Congress. Major accomplishments from the first years work include: 1. a complete search for all environmental, natural resource, social and economic data for the area; 2. the setting up of a comprehensive air quality and meterological monitoring system which will eventually enable predictive modeling for the study area; 3. continued water quality sampling for area streams and Flathead Lake; 4. beginning of research leading to a nutrient budget for the Flathead Lake and river system with special emphasis on the critical phosphorous/sediment relationship, and; 5. a comprehensive effort to understand the areas fisheries and other water quality indicator species. Public support and local involvement in the study via the unique Steering Committee approach (study is directed by a 15 member committee dominated by local interests) continues strong. The major problem with the Flathead Study effort continues to be the uncertainty of third year funding.

POPLAR RIVER EIS

The Poplar River EIS constitutes an in-depth analysis of the social, economic and environmental impact on the U. S. from operation of a 600 MW and possibly 1200 MW coal fired generating plant on the Canadian side of the Poplar River basin. Major potential impacts are in water (loss of available water and deteriorated quality) and air (crop damage from SOx).

The draft EIS should be issued and public hearings held in August, 1979. A final EIS should be issued by the end of 1979.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Flathead Study
Poplar River Environmental Impact Statement

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Assure that the Flathead Study is conducted in a timely and efficient manner in conformance with congressional and EPA intent, and in pursuit of adopted Steering Committee goals.	(1) Serve as EPA representative on Flathead Study Steering Committee.	1 meeting per month		.1			EPA
	(2) Serve as EPA liaison with Study Area Manager.			.05			EPA
	(3) Serve as Project Officer (Co-Officer on two grants on four major research grants.			.05			EPA
	(4) Award FY 1980 Grant				355,000		EPA
	(5) Flathead fishery study.	1983					DFWP
	(6) Flathead limnology study.	1983					University of Montana
	(7) Administration/coordination of study.	1983					Montana Department of Natural Resources and Conservation
Complete Poplar River EIS to assure full disclosure of impacts of Canadian development and to optimize protection of U. S. environment.	(1) Prepare final EIS.	Dec., 1979		.1	40,000	40,000	TETRA TECH
		TOTALS		.3			

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PROGRAM SUMMARY WORK PLAN

PROGRAM: Water

PROGRAM OBJECTIVE: Construction Grants, Safe Drinking Water, Water Quality Management, Wastewater Discharge Permit Program, Clean Lakes

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOMPLISHMENTS	FY 19 ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
		MID-YEAR	END OF YEAR		WORKYEARS		DOLLARS		
					STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Administer Construction Grants Program					12.0	2.45	301,100		WQB, EPA
Administer Safe Drinking Water Program					18.0	1.2	294,500		WQB, Lab, Local Health Dept., EPA
Water Quality Management Planning					7.5	2.25	368,475		
Indian Water Quality Management Planning					3.25				Local Tribes
Areawide Water Quality Management Planning					4.5		102,000		Four Areawides
Wastewater Discharge Permit Program					7.9	2.15	185,500		
Clean Lakes Program					.26	.1	FY 1979 (6,250)		WQB,EPA
Flathead Study						.20			EPA
Poplar River EIS						.1			EPA
Environmental Assessments on WWTP						.40			EPA
Water Quality Standards					.65	.14		30,000	WQB, EPA
Water Quality Monitoring					2.7	-	52,000	5,000	WQB
Quality Assurance, Lab. Evaluations						.3			EPA, Denver

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PROGRAM SUMMARY WORK PLAN

PROGRAM: Water

PROGRAM OBJECTIVE: _____

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOMPLISHMENTS	FY 19__ ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
					WORK YEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Prepare and submit revised continuing planning process, coordinated with 208 plan and 305(b)				June 1980	.05	.02	1200		WQB/EPA
Coordination with Clean Lakes, Section 314					.2		4000		WQB
Develop, review and revise waste load allocations or revise effluent requirements									
Municipal		3	5	Sept 1980	.05		1200		WQB/Consultants
Choteau Red Lodge Chinook Lewistown Dillon Harlowtown Hamilton Conrad									
Industrial		1	2	April 1980	.1	.05	2200		WQB
ASARCO, Troy Anaconda, Stillwater Anaconda, Warm Springs									
State and EPA Water Quality Management Planning Priority Issues					7.1	2.18	191,650		
State and EPA Subtotals					7.3	2.25	200,250		
Areawide Subtotals							102,000		
Indian Subtotals							66,225		
Water Quality Management Totals							368,475		

PROGRAM SUMMARY WORK PLAN

PROGRAM: Water

PROGRAM OBJECTIVE: Provide Groundwater Pollution Control Program
Administer Dredge and Fill Program

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOM-PLISHMENTS	FY 19__ ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
					WORKYEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Groundwater (excludes UIC)									
1. Review need for groundwater regulations and assess manpower needs.				Sept. 30, 1980	0.2 WQB		4,000		WQB
2. Investigate complaints of groundwater pollution and provide recommendations. Provide enforcement when needed.	Unknown			Sept. 30, 1980	0.2 WQB		4,000		WQB
3. Monitor groundwater problems and obtain groundwater samples for analyses.	Unknown			Sept. 30, 1980	0.2 WQB 0.1 Lab		6,000		WQB with assistance from Laboratory Division and Bureau of Mines and Geology
Dredge and Fill									
1. Issue 6(g) authorizations for short-term activities which exceed turbidity standards									
a) 6(g) authorizations issued	30	10	20	Sept. 30, 1980	0.3		6,000		WQB
2. Review and issue certifications to section 404 permits						.2			EPA, Denver (reviews only)
a) Certifications issued	30	10	20	Sept. 30, 1980	0.2		4,000		WQB
b) Waive certifications where adequate review provided by other agencies.	50	20	30	Sept. 30, 1980					WQB
3. Coordinate program with Corps of Engineers, EPA, Dept. of Fish, Wildlife and Parks and Conservation Districts				Sept. 30, 1980	0.1		2,000		WQB
4. Inspect operations									
a) Preconstruction investigations	10	4	6		0.1		2,000		
b) During construction investigations	10	4	6		0.1		2,000		

PROGRAM SUMMARY WORK PLAN

PROGRAM: Water

PROGRAM OBJECTIVE: Provide Pollution Control O & M, Training and Operator Certification and Assume Compliance with Design and Water Quality Standards

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOMPLISHMENTS	FY 19__ ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
					WORKYEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
O & M									
1. Inspections and Follow-up									
a) Conduct EPA Form 7500-5 inspections at all mechanical treatment plants with copies submitted to EPA.	30	10	20	Sept. 30, 1980	0.2 WQB		4,000		WQB
b) Conduct State form inspections at 75% of remainder of treatment facilities	115	40	75	Sept. 30, 1980	0.5 WQB		10,000		WQB
c) Provide special attentio, follow-up and assistance at POTW's that are not operating satisfactorily in coordinated O & M, Enforcement/Grants Effort.	8	4	4	Sept. 30, 1980	0.2 WQB	.1	4,000		WQB, EPA
2. Conduct operator training program									
a) Annual week-long school at M.S.U.	1	1		Oct., 1980	0.2 WQB		4,000		WQB with assistance from Montana State University
Operators trained.	60	60							
b) Conduct seminars throughout state	8	4	4		0.2 WQB		5,000		WQB with assistance from Northern Montana College and Consultants
Operators trained.	120	60	60						
c) Conduct special seminars related to a specific waste water treatment	1		1		0.1 WQB		2,000		WQB with assistance from Consultants
Operators trained.	30		30						
d) Conduct school for laboratory technicians	1		1						WQB with assistance from Laboratory Division
Technicians trained	15		15		0.1 WQB		2,000		
					0.1 Lab.		2,000		
3. Edit, publish and distribute operator newslett .	4 issues	2	2	Sept. 30, 1980	0.2		5,000		
Number of newsletters sent	1,200/issues								
4. Submit 104(g)(1) funding plan for innovative operator training.	1		1	June 30, 1980	—				Northern Montana College

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PROGRAM SUMMARY WORK PLAN

PROGRAM: _____

PROGRAM OBJECTIVE: _____

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOM-PLISHMENTS	FY 19__ ACCOMPLISHMENTS		COMPLETION DATE	FY 19__ RESOURCES				RESPONSIBLE AGENCY
					WORKYEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
5. Assessment of the past effectiveness of the operator training program and recommendations for future training programs.					0.1		2,000		
a) Assessment provided through contract with consultant through 109(b) training center grant	1		1	June 30, 1980				Amount of contract to be negotiated	WQB to select consultant
6. Issue certification licenses to operators and give exams to new operators				Sept. 30, 1980	0.4		—		WQB and Water and Wastewater Operator Certification Board
a) Licenses issued	600	100	500						
b) Exams given	80	50	30						
Compliance (not included with Construction Grants)									
1. Review sanitary sewer extensions	50	20	30	Sept. 30, 1980	0.2 WQB		4,000		WQB. Reviews done in coordination with Subdivision Bureau where subdivision approval is needed.
2. Review new storm sewers to assure minimum runoff of pollutants	10	4	6	Sept. 30, 1980	0.1 WQB		2,000		WQB. Reviews done in coordination with Subdivision Bureau where subdivision approval is needed.
3. Review new sewage treatment facilities	30	10	20	Sept. 30, 1980	0.7 WQB 3.0 Sub-division Bureau		17,000		WQB. Reviews done in coordination with Subdivision Bureau where subdivision approval is needed.
				TOTALS	6.3	.1	63,000		

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AIR QUALITY

State Implementation Plan

Prevention of Significant Deterioration

Air Quality Monitoring

Transportation Control Plans

State Implementation Plan for Lead

Indian Environmental Program

Implement SIP

All nonattainment plans except the Missoula and Billings carbon monoxide (CO) plans should be essentially approved by the beginning of FY 1980. The approval for Missoula and Billings will come during FY 1980. Therefore, the work done in 1980, will be important towards achieving attainment of the National Ambient Air Quality Standards by 1982. Goals outlined for 1980 must be met if attainment is to be achieved by 1982.

A part of SIP implementation is the state's compliance and enforcement program for stationary sources. Continued emphasis will be placed on major source inspections since the Clean Air Act no longer allows for continued non-compliance of major sources through variance procedures. Significant violations by major sources in most instances will have to be dealt with through court actions and, if appropriate, by the imposition of non-compliance penalties.

PSD

Montana should receive PSD delegation during early FY 1980 from EPA. However, prior to delegation, EPA and Montana will enter into an interim agreement which essentially provides for Montana to perform the PSD analyses.

As part of the permit requirements, industries will be required to conduct baseline monitoring and diffusion modeling relating to their proposed activities. The Air Quality Bureau will be required to review the proposed monitoring networks and modeling techniques as well as the results of those efforts. This could take considerable time since each permit will require much public involvement and could result in a considerable amount of controversy--both technical and political. Supplemental EPA financial and technical assistance will therefore be essential to meet these added needs and to insure the successful implementation of the PSD program.

Following promulgation of a visibility regulation by EPA (as required by Section 169A of the Federal Clean Air Act) the state will adopt a rule to deal with visibility requirements in Class I areas.

Air Quality Monitoring

The accurate measurement of Montana's present and future air quality plays an important role in existing and future SIP revisions. The location and impacts of new sources and proper technical and impact analyses are essential for the continued protection of Montana's pristine air quality and to accomodate orderly industrial growth.

The state has completed a review of its air monitoring program and has prepared and submitted a Network Review Report to EPA. Modifications to the existing network will be carried out according to the schedules set forth in that report.

Transportation Control Plans.

The transportation control plans for the Billings and Missoula areas are being developed to determine attainment of the air quality standard for carbon monoxide. A schedule for updating the plans has been developed. Upon completion of the necessary work, the plans will be resubmitted to EPA.

The Billings plan requires updating emission factors. In addition, the Billings City-County Planning Agency has developed some traffic information which it feels may affect the modeling results. Consequently, the modeling will be done again using this revised data. Whether or not the control strategy has to be revised will depend on the outcome of the modeling. If the modeling shows higher levels of CO than the initial modeling effort, it may be necessary to revise the proposed solution to the problem; otherwise the original control strategy should be adequate.

In Missoula, both the modeling data and the model itself are suspected of being inadequate. In addition, there is speculation that Missoula may have a CO problem in the winter months which is attributable to wood stoves and fireplaces. The modeling for the transportation related problem will be redone and the control strategy revised as appropriate. An additional CO monitor has been provided to the Missoula Air Pollution Control Agency to investigate the possibility of areawide problems. The outcome of this investigation will not be known until at least the spring of 1980.

The Federal Highway Administration, the State's Department of Highways and local planning agencies must be involved if SIP strategies are to be completed in an expeditious manner. Because of the long time delays in implementing transportation changes, the process must begin in early 1980 to have any chance of completion by 1982. Regular meetings among the involved groups will be held to insure communication and progress.

Assuming that Great Falls is designated nonattainment for CO, in all likelihood a local governmental agency will have the responsibility to develop the control plan for achieving attainment of the standards. A close working relationship between the Air Quality Bureau and the designated planning agency will be maintained to insure timely development and implementation of a plan, should one be required.

Development of State Implementation Plan for Lead

Based on EPA requirements, lead implementation plans will be developed for the East Helena and Anaconda areas. Both plans will be developed under contracts using EPA funds. Major contract activities will include development of an inventory for stack and fugitive emissions, followed by modeling of the emissions. Hi-volume sampling data indicate violations of the National Ambient Air Quality Air Standard for lead in East Helena, but no violations have been recorded in the Anaconda area. The implementation plan is required for Anaconda because of "potential" lead emissions from the Anaconda Company smelter.

Indian Environmental Program

Although Indian tribes represent a small fraction of Montana population, they have been given a relatively important position via the Clean Air Act. Further, they historically have not been involved with environmental programs because the threat of environmental degradation was not severe. Therefore, their experience in developing programs has been limited.

The Northern Cheyenne and Crow will already have 105 Grants by the time FY 1980 begins. The reservations at Fort Peck and Flathead also demonstrated a strong desire to develop air programs. During the next fiscal year it is expected there will be five to six reservations with an air quality bureau. A major effort will be made by EPA to mesh the state and Indian programs as much as possible. Without the proper federal - state and Indian coordination the programs will not be successful.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Implementation of State Air Quality Plan (SIP) and Pravention of Significant Deterioration (PSD)

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
SIP							
Point Source Compliance	Inspect each Class A source at least once per year	Sept. 30, 1980					Air Quality Bureau (AQB
Area Source Compliance	Inspect significant area sources at least once per year.	Sept. 30, 1980					Air Quality Bureau (AQB
New Source Review	Issue approximately 100 new source permits.	Sept. 30, 1980					Air Quality Bureau (AQB
Emission Inventory Update	Update the emission inventory for all Class A sources at least once per year.	Sept. 30, 1980					Air Quality Bureau (AQB
Emergency Episode Plan	Submit a plan revision.	Sept. 30, 1980					Air Quality Bureau (AQB
Development of Emission Standards for Paved and Unpaved Roads	Develop a report and adopt rule	Sept. 30, 1980					Air Quality Bureau (AQB
	Sub-Totals		14.2	2.00	240,536.		
PSD							
New Source Review	Review and issue approximately 25 PSD permits	Sept. 30, 1980					Air Quality Bureau (AQB
Baseline Monitoring and Data	Review industry baseline monitoring systems and subsequent data for approximately 25 areas.	Sept. 30, 1980					Air Quality Bureau (AQB
Increment Modeling and Tracking	Review industry modeling results for approximately 25 sources.	Sept. 30, 1980					Air Quality Bureau (AQB
Visibility Requirements	Propose a visibility rule for Class I areas.	Sept. 30, 1980					Air Quality Bureau (AQB
	Sub-Totals		1.5	.50	25,409.		

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Air Quality Monitoring
Transportation Control Plans

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Monitoring							
Network Implementation and Operation	Implement network on a schedule as submitted in the Network Review Report (NRR).	Sept. 30, 1980					
Quality Assurance Development and Operation	Develop a quality assurance program in accordance with SAMWQ regulations.	Sept. 30, 1980					
Replace nonequivalent Analyzers	Replace nonequivalent analyzers on a schedule as submitted in the NRR.	Sept. 30, 1980					
Data Acquisition Syetem	Develop and implement data acquistion system on a schedule as submitted in the NRR.	Sept. 30, 1980					
Emission Monitoring Program	Implement continuous emission monit ring requirements for the four designated sources.	Sept. 30, 1980					
Company Data Retrieval/Storage	Develop a program to retrieve and store company collected data.	Sept. 30, 1980					
	Sub-Totals		9.6	.25	262,342		AQB
TCP							
Billings Plan	Update modeling and control strategies	Jan. 1, 1980					
Missoula Plan	Update modeling and control strategies	Jan. 1, 1980					
Intergovernmental Cooperation	Review and update the Section 174 agreements for transportation related pollutants.	$					
Great Falls Carbon Monoxide Plan	Propose designation as a nonattainment area for carbon monoxide and completion of SIP revision if required.	Sept. 30, 1980					
	Sub-Totals		.8	.25	13,551		AQB

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Development of State Implementation Plan for Lead
Indian Programs

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Lead							
East Helena Plan	Develop plan and submit to EPA	Dec. 31, 1979					
Anaconda Plan	Develop plan and submit to EPA	Dec. 30, 1979					
	Sub-Total		.8	.2	73,551.		AQB
Indians							
Implementation of air quality plans, 105 grants administration	Provide a quarterly evaluation of accomplishments	Quarterly		.07	90,000.		EPA/State
	Assist in establishing an adequate quality assurance program in conjunction with state.						
	Assist in preparation of EPA grant	Dec. 31, 1979		.08			EPA/State
	Finalize grants	March 1, 1980					
	Provide training and technical assistance to tribes to develop the necessary in-house expertise						
	Provide enforcement training and assistance						
	Sub-Total			.15			
	Air Totals		26.5	3.35	613,389.		
	Indian Totals				90,000.		

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PROGRAM SUMMARY WORK PLAN

PROGRAM: Air Quality

PROGRAM OBJECTIVE: Implementation of SIP, PSD, Monitoring, RP's

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOMPLISHMENTS	FY 19 ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
					WORKYEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
1. Implementation of SIP					14.2	2.0	240,536		AQB
Inspect Class A Sources	120	60	120	Sept. 30, 1980					
Implement adopted control strategies	12	12	12	Sept. 30, 1980					
Issue new source permits	100	50	100	Sept. 30, 1980					
Monitor plans developed under Section 175	2	0	2	Sept. 30, 1980					
Update emissions inventory for Class A sources.	120	60	60	Sept. 20, 1980					
Revise emergency episode plan	1 plan	0	1	Sept. 30, 1980					
Develop emission standard for paved and unpaved roads (urban fugitive dust study)	1 rule	0	1	Feb. 29, 1980					
Prepare other legally mandated revisions to comply with Clean Air Act	as required	as required	as required	Sept. 30, 1980					
Develop regulations to control pollutants designated under Section 111c	as required	as required	as required	Sept. 30, 1980					
2. Prevention of Significant Deterioration					1.5	.50	25,409		AQB
Review and issue new source permits	25	12	13	Sept. 30, 1980					
Review baseline monitoring and modeling data for 25 proposed sources	25	12	13	Sept. 30, 1980					
Propose visibility rule for Class I areas	1 rule	0	1	Sept. 30, 1980					
3. Air Quality Monitoring					9.6	.25	262,342		AQB
Implement network review report as scheduled.	1 network	0	1	Sept. 20, 1980					
Develop quality assurance program	1 program	0	1	Sept 30, 1980					
Replace non-equivalent analyzers as scheduled in network review report.	as scheduled	as scheduled	as scheduled						
Develop data acquisition system	1 system	0	1	Sept. 30, 1980					
Implement continuous emission monitoring at four designated sources	4 systems	2	4	Sept. 30, 1980					
Develop program to retrieve and store company data	1 system	1	1	Feb. 29, 1980					
4. Transportation Control Plans					.8	.25	13,551		AQB
Update Billings and Missoula modeling and control strategies	2 plans	2	2	Jan. 31, 1980					
Propose designation of nonattainment area for CO in Great Falls and prepare SIP revision if required	1 plan	1	1	Sept. 20, 1980					
Review and update agreements for TCP's	3 agreements	3	3	Feb. 29, 1980					

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PROGRAM SUMMARY WORK PLAN

PROGRAM: Air Quality

PROGRAM OBJECTIVE: See items numbers 5 through 12 below

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOMPLISHMENTS	FY 19__ ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
					WORKYEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
5. Development of Lead SIPS Develop and submit to EPA lead SIP's for Anaconda and East Helena	2 SIPS	2	2	Feb. 29, 1980	.80	.20	73,551		AQB
6. Training Schedule 4 smoke schools and 2 technical courses	6 courses	3	6	Sept. 30, 1980	.1		1,694		AQB
7. Flathead Basin Project Prepare one report	1 report	0	1	Sept. 30, 1980		.03	80,000		
8. Indian Air Quality Plans, Cooperation w Section 105 Grants; provide quality assurance and possible lab support to three tribes	4 grants	4	4	Sept. 30, 1980		.15	90,000		EPA/AQB
9. Poplar River Project Prepare one report	1 report	0	1	Sept. 30, 1980		.02	80,000		
10. Implement non-compliance penalty program	1 rule	0	1	Sept. 30, 1980	.1		1,694		
11. Provide for public involvement in promulgating, maintaining and carrying out air quality Coordinate air quality planning with other agencies where an area-wide approach is required (AQMA, PSD) such that potential and existing problems are identified and a unified plan is developed. Identify public interest groups and establish reasonable opportunity for input and provide information on progress to such groups.	1 program	0	1	Sept. 30, 1980	.2	.05	3,388		AQB/EPA
12. Administration					6.0		101,620		AQB
				TOTALS	33.3	3.45	973,785		

SOLID WASTE

Revision of State Plan

Open Dump Inventory

Solid Waste Regulatory Program

Hazardous Waste Management

Revision of State Plan

State statute requires the DHES to develop and maintain a comprehensive state plan for solid waste management. In 1977, that plan was completed and adopted by the Montana Board of Health and Environmental Sciences. The document defines region and responsible agency identification, and the present state laws governing the management of solid and hazardous wastes. In addition, the state plan provides criteria for establishing state financial assistance for regional or areawide solid waste management planning.

However, it is recognized that the state plan must be periodically evaluated and modified to insure that its application is current and of maximum benefit to Montana. Currently, numerous areawide planning efforts have been initiated throughout Montana. When completed, these areawide plans will become addendum material to the state plan. In addition, the local efforts will provide a sound basis for making decisions on modifications of the state plan. Scheduled activities of the Solid Waste Management Bureau are such that by October 1, 1980, a modified state plan will be developed and adopted.

Open Dump Inventory

Current Montana law provides mechanisms which will be used extensively in conducting portions of the formal open dump inventory. The 1977 "Montana Solid Waste Management Act" requires the bureau to license all solid waste disposal sites with some exceptions (i.e. industrial on-site disposal of non-hazardous wastes). This licensing procedure requires permitting by site classification. As of October 1, 1979, 136 disposal sites will have been issued licenses (82 permanent - 54 conditional). The licensing process is especially useful in gathering baseline data for the open dump inventory. In addition, the 1977 "Solid Waste Management Act" allows the bureau to issue state grants to local government entities for purposes of conducting detailed solid waste management planning. A condition of each planning grant is that a careful assessment be made of existing disposal sites within the planning area. As with the state licensing procedure, the planning effort will be of considerable assistance in conducting the open dump inventory.

In FY 1980, major activities associated with the open dump inventory will include the establishment of classification priorities and the gathering of necessary information for the classification process. These activities will be conducted in conjunction with the identification of disposal sites statewide.

The identification of municipal solid waste and sludge disposal sites will utilize existing instruments such as those reiterated above. With respect to industrial non-hazardous disposal sites, the identification process will rely extensively on surveys and questionnaires that will be sent to all major industries in the state. Because state law allows individuals to dispose of non-hazardous waste on their own property, the physical inspection of industrial sites will occur only with the specific permission of the property owner.

Solid Waste Regulatory Program

The state of Montana already has a solid waste regulatory program under the 1977 "Montana Solid Waste Management Act" and companion administrative rules.

During FY 1980, an evaluation of the administrative rules will be made. If deemed necessary, the DHES through formal state procedures, will seek the required revisions in that rule. Also during this fiscal year, a similar evaluation will be made of the "Montana Solid Waste Management Act." If it is determined that statute changes are required in the act, the appropriate amendments will be prepared for introduction in the 1981 Montana State Legislature.

Hazardous Waste Management

During FY 1980, a concerted effort will be made by the Solid Waste Management Bureau to initiate the development of a statewide hazardous waste management program. This effort will be concentrated in three principal areas:

1) Development of workable surveillance and data handling systems;

2) prepare program and application for hazardous waste interim authorization and

3) review existing state statutes and arrange for appropriate amendments to qualify for full authorization.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE **Inventory, Regulatory Program, State Plan Revision, Hazardous Wastes**

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
To revise existing solid waste management state plan	1) Determine required revisions according to 40 CFR 256.	Jan. 1, 1980	.02	.01	825		SWMB, EPA
	2) Develop a state plan based upon the identified revisions needed and which will encompass the following elements:	Oct. 1, 1980	.16	.04	6,675		SWMB, EPA
	a) General requirements to include consideration of all waste types, management aspects, priorities, planning processes, identification of legislative authority;						
	b) Identification of responsibilities for plan development and implementation, disposal facilities classification, regulatory program, facility development, resource recovery;						
	c) A disposal program which will provide for necessary regulatory powers, and the closure or upgrading of open dumps;						
	d) A resource recovery program defining policy, removing long-term contract prohibitions, and providing for procurement of recovered materials;						
	e) Facility planning and development for solid waste, hazardous waste and resource recovery;						
	f) Coordination of applicable federal, state and local programs;						
	g) Assure required level of public participation in all work elements.						
To perform a statewide open dump inventory	1) Locate all municipal disposal sites	Oct. 1, 1980	.05		2,000		SWMB
	2) Locate all municipal sludge disposal sites	Oct. 1, 1980	.05		2,000		SWMB, WQB
	3) Locate industrial non-hazardous disposal sites	Oct. 1, 1980	.05		2,000		SWMB

DETAILED WORK PLAN FOR PRIORITY ISSUES

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Develop and implement a functional hazardous waste management program	4) Locate agricultural and mining disposal sites	Ongoing	.05		2,000		SWMB
	5) Establish priorities for classifying facilities	Dec. 1, 1979	.05	.02	2,000		SWMB, EPA
	6) Gather required information needed for classification process	Oct. 1, 1980	.45	.02	18,000		SWMB, EPA
	7) Perform classificatioo determination according to EPA Site Classification Manual.	Oct. 1, 1980	.2	.02	8,000		SWMB, EPA
	8) Notify owners/operators of the classification determinations according to state defined procedures	Ongoing	.05	.02	2,000		SWMB, EPA
	9) Submit inventory classification forms to EPA on October 1, 1980, and on each succeeding October 1.	Oct. 1, 1980	.05	.02	2,000		SWMB, EPA
	1) Assess needs for additional resources and begin expansion of resources to meet identified needs	Jan. 1, 1980	.30	.02	12,300		SWMB, EPA
	2) Define the needs for additional regulations or regulatory amendments, as necessary for interim authorization	Mar. 1, 1980	.20	.01	8,200		SWMB, EPA
	3) Initiate the development of standard surveillance procedures and schedules; enforcement procedures	July 1, 1980	.15	.05	6,150		SWMB, EPA
	4) Develop interim authorization application, authorization plan, and memorandum of agreement	Jan. 30, 1980	.20	.20	8,200		SWMB, EPA
	5) Submit authorization package	Feb. 1, 1980	.05	.05	2,050		SWMB, EPA
	6) Perform public participation activities	Sept. 30, 1980	.10	.03	4,100		SWMB, EPA
	7) Develop and implement workable data handling system for manifests and reports	June 1, 1980	.25	.03	10,250		SWMB, EPA
	8) Finalize any necessary inter-agency agreements regarding related state environmental programs	Mar. 1, 1980	.20	.03	8,200		SWMB, EPA

DETAILED WORK PLAN FOR PRIORITY ISSUES

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
	9) Prepare forms and procedures for licensing, manifests, required reproting and inspections	July 1, 1980	.10	.03	4,100		SWMB, EPA
	10) Implement hazardous waste control program	July 1, 1980	.20		8,200		SWMB
	11) Prepare dreft amendments to any stete laws, as may be necessary for full authorization	Sept. 30, 1980	.10		4,100		SWMB
	12) Provide technical assistance	Sept. 30, 1980	.45		18,614		SWMB
	13) Update and expand hazardous waste survey in coordination with EPA survey activities	Sept. 30, 1980	.30		12,300		SWMB
Butte/Silver Bow County radiation project	1) Conduct preliminary identification of potential radiation problems in the Silver Bow County area		Funding contingent upon federal approval	.15			SWMB, OEB EPA
	2) Develop strategy for meeting radiation problems identified in the evaluation phase						
To develop and implement a solid waste regulatory program	1) Review and make revisions of existing state administrative rules as needed	May 1, 1980	.04	.03	1,650		SWMB, EPA
	2) Identify needed statute changes and introduce appropriate amendments to existing state statutes	Ongoing	.02	.02	850		SWMB, EPA
		TOTALS	3.84	.80	156,764		

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PROGRAM SUMMARY WORK PLAN

PROGRAM: Solid Waste

PROGRAM OBJECTIVE: Regulatory Program, Development of State Plan and Hazardous Waste

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOMPLISHMENTS	FY 19 ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
					WORKYEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Open Dump Inventory									
Identification of municipal solid waste and sludge disposal sites statewide				Oct. 1, 1980	.1		4,000		SWMB, WQB
Identification of industrial non-hazardous disposal sites				Oct. 1, 1980	.05		2,000		SWMB
Identification of agricultural and mining non-hazardous disposal sites					.05		2,000		
Establish and implement classification process				Oct. 1, 1980	.8	.10	32,000		SWMB, EPA
Regulatory Program									
Revision of state solid waste regulatory program				Oct. 1, 1980	.06	.05	2,500		SWMB, EPA
Development of State Plan									
Revision of existing solid waste management state plan				Oct. 1, 1980	.18	.05	7,500		SWMB, EPA
Hazardous Waste									
Development of a functional state hazardous waste management				Oct. 1, 1980	2.6	.45	106,764		SWMB, EPA
Conduct But :/Silver Bow County radiation program				Completion date and funding contingent upon federal approval		.15			SWMB, OHB, EPA
Indians									
Provide technical assistance to interested tribes						.05			EPA
				TOTALS	3.84	.85	$156,764		

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PESTICIDES

Enforcement

Certification

PESTICIDES ENFORCEMENT

The DOA's authority for registering pesticides, licensing and certifying applicators, licensing dealers and operators and for conducting inspections and enforcement activities are set forth in the Montana Pesticide Act, Section 80-8-101 through 306 M.C.A., 1979. The department is authorized to enter into a cooperative enforcement agreement with EPA under Section 80-8-110 M.C.A., 1979 of the Pesticide Act.

The DOA proposes to continue the comprehensive cooperative enforcement program and agreement with EPA encompassing inspections, investigations, pesticide sampling, laboratory pesticide analysis, efficacy studies, bioassays and enforcement. These activities would be continued under the quality assurance agreements made with EPA under previous grants.

The allocation of personnel to the Environmental Management Division of the DOA is 29.73 full time equivalents (F.T.E.) for FY 1980 and was 30.1 in FY 1979. State funding supports 13.01 F.T.E. and EPA funding would support 16.72 F.T.E.'s, which is nearly identical to FY 1979. The F.T.E. in support of enforcement grant activities will be 21.71 of which 16.72 F.T.E. are federally funded and 4.99 F.T.E. are state funded.

The strategy for continuing the cooperative State/EPA enforcement program in Montana is to maintain the quality assurance programs previously approved All inspections, investigations and collection of samples will be in accordance with EPA approved proceedures to insure that either the state or EPA can take effective action against violators. The state will be improving the monitoring of Section 24c, Section 18 and experimental use permits, issued by EPA or the state, to insure that labels and use restrictions are adhered to by dealers and applicators. Special activities will be carried out in the areas of major pesticide use projects to insure violations do not occur and that significant environmental degradations does not occur.

Some environmental monitoring of soil, water, air and vegetation will be performed to determine if additional use restrictions or monitoring are required.

The DOA will conduct efficacy testing of some pesticides when it is suspected or reported that a given pesticide is not efficacious. Residue sampling of several pesticides has shown that in some cases the higher label rate and in other cases the lower label rate are the most efficacious under Montana conditions. Special efforts to monitor misuse or use damage episodes or accidents will be undertaken by performing complete investigations, chemical analyses, bioassys and documenting with infra-red and normal color photographs.

The state analytical laboratory upon proper agreement with EPA or other states will analyze their samples for a fee covering supplies, materials and communications. These samples will be analyzed according to the adopted EPA quality assurance program.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	PEDERAL	GRANT	CONTRACT	
1. Administrative-Enforcement Activities	1. Administration	Sept. 30, 1980	2.11		25,142		DOA
	2. Maintain the current documentation of violations, case preparation activities, and implement administrative and/or judicial proceedings against violators.	Sept. 30, 1980	.25		20,588		DOA
	3. Improve the communication on enforcement cases between the state and EPA to ensure violations are actively pursued and are properly concluded.	Sept. 30, 1980	.05		500		DOA
	4. Continue to improve Montana Pesticide Act (registration, certification, violations) and rules (registration, certification, violations, administrative procedures).	Sept. 30, 1980	.2		5,694		DOA
	5. Continue and improve the EPA/State cooperative enforcement agreement.	Sept. 30, 1980	.1		300		DOA
	6. Maintain the data processing system for monitoring certificates, violations and the recording of enforcement actions and results.	Sept. 30, 1980	.5		28,235		DOA
	7. Secretarial/Clerical	Sept. 30, 1980	1.76		24,000		DOA
	Sub-Total EPA			0.1			
	TOTALS		21.50	.94	$602,641		

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Pesticide Enforcement

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
A. Conduct Use and Misuse Inspections and Investigations	1. Conduct 600 Commercial applicator inspections	Sept. 30, 1980	.6		30,000		DOA
	2. Investigate reported or discovered pesticide Misuse or damage episodes (approximately 60/yr.)	Sept. 30, 1980	1.07		30,500		DOA
	3. Conduct 50 commercial applicator use observation inspection.	Sept. 30, 1980	.48		14,000		DOA
	4. Collect pesticide samples (formulation residue, use dilution) when a violations is suspected or as part of the normal sampling program.	Sept. 30, 1980	.48		23,780		DOA
	5. Investigate and monitor major pesticide use projects of government agencies and industry to insure violations do not occur.	Sept. 30, 1980	.64		18,500		DOA
	6. Conduct specific investigations on the effects of use or misuse of pesticides on the environment (soil, air, water, organisms, and determine if additional enforcement restrictions and/or monitoring procedures are needed.	Sept. 30, 1980	.91		25,100		DOA
	7. Utilize infra-red and natural color photography to assist in documenting pesticide episodes and accidents affecting vegetation.	Sept. 30, 1979	.1		8,000		DOA
	Sub-Total - EPA			.4			
B. Implement the Private Applicator Enforcement Program - based upon the plan developed in FY 1979.	1. Compile and analyze completed data and prepare a plan from the 1979 use observations.	Feb. 29, 1980			16,000		DOA
	2. Conduct use observation as determined in FY 1979 plan.	Sept. 30, 1980	1.28		20,000		DOA
	3. Conduct special equipment, storage and disposal investigations.	Sept. 30, 1980	.47		7,897		DOA
	4. Collect samples.	Sept. 30, 1980	.2		2,600		DOA
	Sub-Total - EPA			.10			

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
C. Monitor the state certification program	1. Inspect 134 dealers to determine if restricted use pesticides are being sold in violation of Section 12(a) (2)(f).	Sept. 30, 1980	.35		10,000		DOA
	2. Check 134 dealers and 600 applicators to determine if they are properly licensed and are maintaining adequate records.	Sept. 30, 1980	.35		10,000		DOA
	3. Inspect the records of 134 dealers and 600 applicators to determine if restricted use pesticides are being sold or used in violation of the Act.	Sept. 30, 1980	.35		14,700		DOA
	4. Inspect applicator use of restricted use pesticides to determine if they are being used in accordance with labels directions.	Sept. 30, 1980	.35		10,000		DOA
	Sub-Total Federal			.04			
D. Monitor Section 24(c) Registrations, Section 18 exemptions and experimental use permits.	1. Monitor EPA and state issued experimental permits.	Sept. 30, 1980	.27		8,000		DOA
	2. Monitor sale and use of 24(c) registered pesticides.	Sept. 30, 1980	.33		10,000		DOA
	3. Monitor sale and use of exempted pesticides.	Sept. 30, 1979	.2		6,000		DOA
	4. Collect samples when a violation is suspected.	Sept. 30, 1980	.15		4,500		DOA
	Sub-Total EPA			.20			
E. Conduct Producer Establishment Inspections	1. Inspect each producer establishment once every two years.	Sept. 30, 1980	.02				
	2. Sample each restricted use pesticide once every two years and each general use pesticides once every five years.	Sept. 30, 1980					
	3. Determine if the books and records required by Sections 8 and 40 CFR 169 are being maintained properly.	Sept. 30, 1980			1,000		DOA

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
A. Conduct Market Place Inspections.	1. General use pesticides-check labeling	Sept. 30, 1980	.018		700		DOA
	2. Restricted use pesticides - check labeling and sales.	Sept. 30, 1980	.018		700		DOA
	3. Check for unregistered pesticides	Sept. 30, 1980	.018		700		DOA
	4. Sample pesticides subject to decomposition that are over one year old.	Sept. 30, 1980	.018		700		DOA
	5. Conduct surveillance for suspended -- cancelled products.	Sept. 30, 1980	.018		700		DOA
	6. Conduct surveillance for products produced in non-registered establishments	Sept. 30, 1980	.03		854		DOA
B. Other Field Activities	1. Surveillance of imported pesticides.	Sept. 30, 1980	.02		569		DOA
	2. Issuance of stop sales or embargoes for pesticides suspended, cancelled or recalled by EPA.	Sept. 30, 1980	.07		3,000		DOA
	3. Develop and improve an interagency response team to handle pesticide spills, warehouse fires and the like.	Sept. 30, 1980	.06		1,708		DOA
	Sub-Total EPA			.1			
B. Laboratory Activities	1. Maintain the chemicel analytical program for analyzing all pesticide formulation and residue samples collected in accordance with the quality assurance program.	Sept. 30, 1980	4.75		184,604		DOA
	2. Implement a biological efficacy testing program for selected pesticides.	Sept. 30, 1980	1.05		14,000		DOA
	3. Utilize the biological laboratory for bioassay studies involving plant damages and soil residue.	Sept. 30, 1980	0.38		5,000		DOA
	4. Provide analyticel services to EPA and other stetes.	Sept. 30, 1980	1.0		14,370		DOA

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PROGRAM SUMMARY WORK PLAN

PROGRAM: PESTICIDE

PROGRAM OBJECTIVE: ENFORCEMENT

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOMPLISHMENTS	FY 19 ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
					WORKYEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Implement, maintain and improve the total State/EPA Pesticide Enforcement Programs under authority of the Montana Pesticide Act as amended, 1971, and FIFRA, as amended, 1972.				Sept.30, 1980	25.2	.94	602,641		DOA, EPA
Inspections and Investigations									
Commercial Applicatore	600	250	350	Sept. 30, 1980	1.30		60,280		DOA
Commercial Use Observations	50	5	45	Sept. 30, 1980	0.48		14,000		DOA
Dealers	188	94	94	Sept. 30, 1980	0.70		14,420		DOA
Private Applicacor Use Observation	600	----	600	Sept. 30, 1980	2.24		43,900		DOA
Formulation Plants	3	3	----	March 31, 1980	0.02		1,000		DOA, EPA
Market Place	600	250	300	Sept. 30, 1980	0.12		4,354		DOA
Episodes, Accidente	60		60	Sept. 30, 1980	1.17		38,500		DOA
Major Pesticide Projecte	5	----	5	Sept. 30, 1980	0.64		18,500		DOA
Specific Investigations	6-10	----	6-10	Sept. 30, 1980	0.91		25,100		DOA
Samples and Sampling	860	230	630	Sept. 30, 1980	0.83		30,880		DOA
Formulation	430	215	215	Sept. 30, 1980					
Residue	430	15	415	Sept. 30, 1980					
Use dilution	as needed			Sept. 30, 1980					
Monitor Section 18, 24c, 5f	200		200	Sept. 30, 1980	0.8		24,000		DOA
Other Field Activities	as required		continuous	Sept. 30, 1980	0.15		5,277		DOA
Laboratory Activities	3508-3838	760	2,749-3,079	Sept. 30, 1980	7.18		217,974		DOA
Analytical Laboratory-Quality Assurance Program-No. of Analysis	2,838	760	2,079						
Efficacy Testing	10		10						
Bioassay	as needed -	related to	pesticide accidents and episodes						
EPA Samples - No. of Analysis	660-990		660-990						

PROGRAM SUMMARY WORK PLAN

PROGRAM: PESTICIDES

PROGRAM OBJECTIVE: ENFORCEMENT

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOMPLISHMENTS	FY 19 ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
		MID-YEAR	END OF YEAR		WORKYEARS		DOLLARS		
					STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Administration-Enforcement This includes normal Administration of grant activities, documentation of violations, case preparation and administrative and judicial proceedings, improvement of State and EPA agreements and cooperative actions, maintenance of data - processed certificates and violations and secretarial/clerical support for all grant activities.					4.97		104,459		DOA
Implemeot reciprocal agreements with the Indian Reservations on certification and enforcement within the limitations of leagal authority and funding. Assist any interested tribe in obtaining a pesticide certification and enforcement grant.					.05				EPA

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PESTICIDE CERTIFICATION

The certification program is a federally mandated program (Federal Insecticide, Fungicide, Rodentcides Act (FIFRA), as amended, 1972), which requires pesticide applicators using restricted use pesticides to comply with state and federal certification standards. The Montana Certification Plan was approved by EPA and has been in effect since 1976.

Virtually all commercial and government applicators who presently desire to use restricted products have been certified. The best estimates indicate that approximately 60 percent of the private applicators desiring certification have been certified. This means that one objective of the present certification grant proposal will be to provide training and testing for new commercial and government applicators, and for 6,000 private applicators in Montana. Additionally, under Montana's Certification Plan, recertification training for several categories of commercial and government applicators will begin in calendar year 1980.

The strategy will be to conduct at least one general certification training course (24 hours) for new commercial and government applicators who wish to be certified. At least 50 training courses for private applicators will be held for first-time certification. Both of these activities would be conducted cooperatively with the Cooperative Extension Service.

This summer (FY 1979), the DOA will be conducting pesticide use observations of private applicators. Because of the way part of the survey form is constructed, we will be able to identify those areas in the training that are weak and need improvement. Other agencies and enforcement inspections have also pointed out some areas of the training that need improvement and modification. Implementation of these changes will be made during the FY 1980 grant period.

Another strategy will be to begin recertification training for several pesticide applicator categories. (Agricultural Animal, Agricultural Plant, Aerial, Ground, Forest and Ornamental, Seed Treatment). Development and presentation of the training courses will be accomplished by the DOA, the Cooperative Extension Service and representatives from the appropriate industries.

The data-processing issuance of certification credentials will be maintained for previously certified applicators and will incorporate new applicators into the system.

Updates and revision of pesticide materials and manuals will continue as will special training programs such as the Wives' Pesticide Safety Program.

Under the proposed grant activities no specific personnel will be funded, but grant activities will amount to 3.69 F.T.E.'s. The state share in achieving the certification objectivities will be a match of 50 percent ($20,400).

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Maintain the established pesticide certification and training program

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
a. Continue certification of new commercial and government applicators and dealers.	1. Administration		.2		650		
	2. Hold one general certification training course for new pesticide applicators (50).	April 1, 1980	.02		500		DOA, CES
	3. Issue certification credentials to new applicators (some by training and exam, some by exam only) (100).	Sept. 30, 1980	.55		1,000		DOA
b. Continue certification of private applicators	1. Hold training courses for private applicators in cooperation with the Cooperative Extension Service, the Montana Department of Livestock, and others. (50)	Sept. 30, 1980	.35		2,500		DOA, CES, DOL
	2. Issue certification credentials to private applicators (6,000)	Sept. 30, 1980	.3		4,500		DOA
c. Begin recertification training of applicator categories identified in Montana's recertification schedule.	1. Officer recertification training to 6-7 pesticide applicator categories to enable them to begin accumulating qualification points for recertification in upcoming years.	Sept. 30, 1980	.3		1,850		DOA
d. Incorporate improvement and/or modifications into training programs that have been determined by qualitative evaluations conducted this fiscal year. (Safety, storage, handling, equipment problems, etc.)	1. Meet and discuss with the Extension Service, Agricultural Experiment Stations, various state agencies, industry, and the general public about ways to improve the certification training programs.	Dec. 1, 1980	.29		1,000		DOA, CES, ARS, Indus
	2. Implement improvement and modifications determined by evaluations and the suggestions made by the interested groups.	Feb. 1, 1980	.25		500		DOA
	3. Incorporate improvements based upon enforcement cases, inspections, and use observations of applicators and dealers to prevent improper use of pesticides.	Feb. 1, 1980	.1		300		DOA

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. _____

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONE	FY 19__ RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
E. Continue revision of pesticide manuals and exams for specific applicator classifications	1. Technical staff revision and review of manuals and exams (assigned based on area of knowledge and expertise,)	Sept. 30, 1980	.39		1,500		DOA
	2. Secretary and Clerical		.19		1,800		DOA, CES
F. Implement special training programs as they are developed and/or as the need arises.	1. Wives Pesticide Safety Prograr (35mm slide-casseette tape format) (50)	ongoing	.30		1,800		
G. Continue data-processed issuance of certification permits (certificates to certified commercial, government and private applicators)	1. Issuance of permits (5,000)	Sept. 30, 1980	.45		2,500		DOA
	TOTALS		3.69	.06	20,400		

PROGRAM SUMMARY WORK PLAN

PROGRAM: PESTICIDE

PROGRAM OBJECTIVE: CERTIFICATION

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOM-PLISHMENTS	FY 19 ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
		MID-YEAR	END OF YEAR		WORKYEARS		DOLLARS		
					STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Certificates Issued	16,327	15,327	1,000	Sept. 30, 1980	1.5		8,650		DOA
Training Activities and Courses	110		110	Sept. 30, 1980	.97		6,650		DOA, CES, DOL
Manual and Examination Revision	as needed				1.22		5,100		DOA
TOTAL					3.69	.06	20,400		

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CATEGORICAL PROGRAMS

Asbestos in Schools

Toxics

Noise

Emergency Response

Public Participation

Federal Agency EIS Review

CATEGORICAL PROGRAMS

ASBESTOS IN SCHOOLS PROGRAM

The Environmental Protection Agency (EPA) has sent packages announcing the Asbestos In Schools Program to each school district in the State of Montana. The package describes sample collection procedures and remedial measures which can be taken to reduce the danger from sprayed asbestos materials.

The EPA's Montana Office will provide assistance to the school districts by directing them to laboratories that can properly analyze the sample for asbestos content. The office will also coordinate technical assistance from the Regional Office and any other available agencies. Should future legislative efforts provide for funding of the Asbestos In Schools Program, coordination will also be the responsibility of the Montana Office.

The Montana State Occupational Health Bureau will provide assistance where resources allow.

TOXICS

The Environmental Protection Agency, Denver Office, has sent a copy of the Federal Register, February 17, 1978, Part V, Polychlorinated Biphenyl (PCB) Disposal and Marketing, to all known users of the PCBs in the State of Montana.

The EPA Montana Office will conduct inspections of these establishments taking samples where indicated and explaining the rules and regulations which now govern the use of PCBs in Montana. Participation in alerting and informing the public to PCB hazards and problems will be accomplished.

The State of Montana Health Department Solid Waste Bureau has expressed interest in this program. This interest will be encouraged.

NOISE

There are several areas in which resources will be provided for the noise program in the coming year for the State of Montana.

The Office of Noise will select a technical assistance center in each region. The University of Montana located at Missoula is being considered for selection. Should the University by selected, resources will be available on a regional basis.

The City of Missoula has submitted an application for the grant under the Quiet Communities Program. Resources from the University of Montana will be made available to the city.

The Montana Office will respond to noise problems on a local level where requested.

The State Department of Health and Environmental Sciences is currently assuming no responsibility in the noise program.

EMERGENCY RESPONSE

I. Revise Emergency Response Plan.

The Montana Emergency Response Plan needs to be revised to update and consolidate the "Emergency Response Plan" and the "Oil Spill Contingency Plan." Further, the State needs to demonstrate that it has the same authority as the EPA Administrator. During 1980 the plan will be revised. EPA will provide guidance on the extent of revisions that need to take place. The Montana Office will provide assistance in revising and implementing the plan. A committee will be established to direct the revisions. A person will need to be appointed as the coordinator for the plan to see that all aspects of it are carried out.

II. Implementation of Emergency Response Plan.

The Montana Office emergency response program includes directing or coordinating immediate reaction activities and supporting the Regional and State staff teams in follow-up activities. Immediate reaction activities include: insuring all appropriate agencies are informed, identifying extent of threat to public health and safety, recommending enforcement actions as necessary to promote protection and cleanup. Support provided in follow-up activities includes: communications assistance, resource identification, operations inspections, sampling and enforcement action support data collection.

On-scene coordinator responsibilities will be carried by appropriate Regional personnel. These responsibilities include: assembling emergency response team, directing containment and cleanup activities and obligation of emergency funds.

PUBLIC PARTICIPATION

Recent federal policy and guidance on public participation will complement existing State and EPA efforts. The 45 days notification requirement for public hearings will necessitate better planning of public participation activities. Responsiveness summaries will be prepared for all public hearings and key public meetings. Content of these summaries will follow appropriate guidance. Feedback to the public will be provided when appropriate. Normally it will consist of follow-up meetings, personal letters or phone calls.

Financial and technical assistance to the public and interest groups will be a high priority for FY 1981. The Montana Association of Conservation Districts and the Montana League of Cities and Towns will be two organizations that will be receiving significant financial assistance from the State and EPA. The Montana Office will have approximately $2,000 to provide supplemental support to all programs.

The details of the public participation activities are included in the individual program narratives and workplans.

FEDERAL AGENCY EIS REVIEW

EPA has review authority over all Federal EIS's via Section 309 of the Clean Air Act. In Montana most of the Federal EIS's are written on Forest Service and BLM land use plans and project plans, on USBR and COE water development projects, and on highway and airport projects. The purpose of these reviews and involvement with the other federal agencies is to gain enviornmentally acceptable projects and plans. There will be approximately 20 Federal EIS's reviewed by the Montana Office this year.

Numerous federal agencies are involved in energy related projects in Montana. These include the BPA and Colstrip power plants and transmission lines; USGS and the Powder River Regional Coal EIS; Kootenai Falls hydro-generation plant; and several south-eastern Montana coal strip mine projects.

EPA involvement in these projects is to assure that the agencies fully consider the environmental impacts of their proposed projects.

DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Categorical

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Asbestos							
Protect health and well being of school children in the State of Montana attending schools that contain sprayed asbestos materials	Provide assistance and technical advise to school district administrators	Continuous		.06			EPA
	Develop sample analysis program for the Montana school districts	Nov. 1979		.02			EPA
	Develop strategy for ongoing activities	June 1980		.02			EPA
	Provide technical assistance as resources will allow	Continuous					
		Total		.10			Occupational Health Bureau
Toxics							
Assist in developing work plans for identified toxic substances of concern in Region VIII.	Review and comment on all six strategies. Provide any other assistance as necessary.	Ongoing		.01			EPA
Implement PCB work plan in Montana	Inspect facilities which store or use PCB contaiing materials	20 during FY 1980		.10			EPA
	Prepare any technical documentation in support of enforcement actions on violations found during inspections.			.02			EPA
	Complete inventory of all sources subject to the PCB provisions of TSCA.			.01			EPA
Strengthen and assist State in developing an integrated toxics program.	Establish guidance committee for developing State's strategy			.02			EPA
	Develop strategy.						
Implement public awareness of PCB program.	Insure newsletters, speeches, etc. are given adequate coverage by the local press.			.01			EPA

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Categorical

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Noise							
Control noise sources within the State of Montana to protect public health and the environment.	Locate technical assistance center at the University of Montana, Missoula, to provide support where needed. Will conduct training program.	July 1, 1979 thru Dec. 1980		.02		$ 60,000	EPA, Montana Office, U of M
	Assist the City of Missoula if they obtain the Quiet Communities grant in preliminary noise abatement program analysis.	Oct. 1979 thru Sept. 1980		.02	$10,000		EPA, U of M, City of Missoula
	Respond to local citizen concerns with noise programs.	Oct. 1979 thru Sept. 1980		.05			EPA
	Reduce helicopter noise problems.	Sept. 1, 1979		.02			EPA
Emergency Response							
Revise Emergency Response Plan	Set up committee for directing this revision to the existing plan.	Oct. 31, 1979					State
	Define scope of revisions.	Jan. 1, 1980		.01			State/EPA
	Establish a method for coordinating and maintaining emergency response procedures and activities.	Feb. 1, 1980					State
	Prepare draft revisions and submit to interested parties for review.	March 1, 1980		.13			State
	Review comments and prepare final plan.	June 1, 1980		.05			State/EPA
	Adopt plan (effective date).	Oct. 30, 1980					State
	Carry out maintenance activities including training and maintaining equipment.	Ongoing		.01			State
	Total			.2 (includes .10 of EPA Region VIII's time)			
Assist in implementing Emergency Response Plan	Provide initial EPA response as specified in plan.			.05 (contractor)			MO EPA
	Serve as on-scene coordinator.			.1			Regional EPA

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DETAILED WORK PLAN FOR PRIORITY ISSUES

PRIORITY ISSUE NO. Federal Agency EIS Review

OBJECTIVE	ACTIVITY/OUTPUT	MILESTONES	FY 19 RESOURCES				RESPONSIBLE AGENCY
			WORKYEARS		DOLLARS		
			STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Impact federal agencies (BLM, FS, BPA, USGS, OSM) to gain environmentally acceptable energy development project.	(1) Consult (pre-EIS) with USGS on Powder River Regional EIS/review draft EIS.	draft EIS in Sept-Oct 1979		.15			USGS/MT Department of State Lands
	(2) Colstrip 3 and 4.	ongoing					BPA/MT Department of State Lands
	(3) Northern Tier Oil Pipeline.	final EIS in Nov 1979					BLM/MT DNRC
	(4) Mining plans.	continuous probably 2 plans in FY 1980					OSM, etc.
Impact various federal agencies to gain environmentally acceptable projects.	(1) Pre-EIS consultation/EOS review of Forest Service Forest Management Plans.	3 management plans in FY 1980		.20			U.S. FS
	(2) Pre-EIS consultation/EIS review of BLM grazing plans, energy area land use plans, and other land use plans.	3 plans in FY 1980					U.S. BLM
	(3) Pre-EIS consultant/EIS review of highway plans, airport plans, etc.	10 EIS's/ plan in FY 1980					Deptartment of Transportation HUD, etc.
	(4) Pre-EIS consultation/EIS review of water development projects.	Libby Re-reg Dam EIS	Fall 1980				Corps of Engineers
		numerous river plans	Approx. 3 FY 1980				COE, Bureau of Rec., SCS
			TOTAL	.35			

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PROGRAM SUMMARY WORK PLAN

PROGRAM: Categorical

PROGRAM OBJECTIVE: _____

MAJOR OUTPUT/ACTIVITY DESCRIPTORS	PROJECTED ACCOM-PLISHMENTS	FY 19 ACCOMPLISHMENTS		COMPLETION DATE	FY 19 RESOURCES				RESPONSIBLE AGENCY
					WORKYEARS		DOLLARS		
		MID-YEAR	END OF YEAR		STATE/LOCAL	FEDERAL	GRANT	CONTRACT	
Asbestos in Schools Program				Ongoing		0.06			EPA
Toxics				Ongoing		0.17			EPA
-PCB inspections		10	20	Oct. 1980					EPA
Noise				Ongoing		0.11			EPA
Emergency Response				Ongoing		0.3			EPA
Federal Agency EIS Reviews		10	10	Oct. 1980		0.35			EPA

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